IFC International Finance Corporation
WORLD BANK GROUP

Assessment of the Sustainable Rice Platform

A Benchmark Analysis against the IFC Performance Standards, Good Practice for Standards Systems Assurance and Governance, and Selected Elements of Other Standards Systems

FOLUR

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Acronyms

ASP	Assurance service provider
BCI	Better Cotton Initiative
CoC	Chain of Custody
CAB	Conformity assessment body
FSC	Forest Stewardship Council
GHG	Greenhouse gas emissions
ha	Hectares
IFC	International Finance Corporation
ILO	International Labour Organization
IMS	Internal management system
IRRI	International Rice Research Institute
ISEAL	Formerly the International Social & Environmental Accreditation & Labelling Alliance; now known simply as ISEAL
MT	Metric ton, also tonne (1,000 kg)
NGO	Nongovernmental organization
PI	Performance indicator
PS	Performance standard
RSPO	Roundtable on Sustainable Palm Oil
RTRS	Round Table on Responsible Soy Association
SRP	Sustainable Rice Platform
UNEP	United Nations Environment Programme

Note: All currency conversions to U.S. dollars in this report are based on the average exchange rates for September 2024, as published by the International Monetary Fund (IMF), unless otherwise specified.

Executive Summary

Rice is one of the world's most important staple foods, but it requires heavy land and water use, and is responsible for more than one-tenth of human-generated methane emissions. Producing sustainable rice using climate-smart best practices can minimize negative environmental impact while improving the livelihoods of rice producers. Indeed, implementing sustainability measures in rice fields could reduce methane emissions by at least 30% below 2020 levels by 2030 (Wang et al. 2023).

The Sustainable Rice Platform (SRP) was established in 2011 to catalyze global rice sector transformation by developing tools and mobilizing rice stakeholders to promote on-farm adoption of sustainable best practices. The SRP is a multistakeholder roundtable, comprising more than 100 institutional members from the public, private, research, civil society, and financial sectors. The SRP operates a sustainable rice standards system. The SRP Standards System includes a number of normative documents that define sustainable rice farming practices, how these are verified in the field ("assurance"), and how the SRP as an organization is governed ("governance").

As an investor, the International Finance Corporation (IFC) is seeking opportunities to finance and support companies operating in sustainable rice supply chains. The IFC Performance Standards on Environmental and Social Sustainability (IFC Performance Standards, or IFC PS) (IFC 2012), requires clients engaged in primary production of living natural resources to manage these resources in a sustainable manner, and where available, to implement credible standards. Therefore, the results of this Assessment of the Sustainable Rice Platform can be used by IFC to:

Determine
whether it is a credible standard

Show
how implementing the SRP Standards System could help a client meet the IFC Performance Standards

Inform
new opportunities related to financing and supporting companies operating in sustainable rice supply chains

Benchmarking the Sustainable Rice Platform (SRP) Standards System

This assessment of the Sustainable Rice Platform (SRP) Standards System was commissioned by IFC and carried out by an independent consultant using desk-based analysis of documents and follow-up clarification with the SRP Secretariat.

A comparative summary of the benchmark of the SRP Farm Standard against the IFC Performance Standards is provided in Table 1 below, and the body of the report contains detailed findings of this benchmark as well as the analysis of the SRP Standards System against good practices for assurance, and good practices for governance. Furthermore, a comparison of the SRP against its peers (i.e., other voluntary standards systems for sustainable forestry and agriculture) covers the legal structure and founders, membership categories and fees, operating budget, and verification approach and market penetration.

The SRP Farm Standard is aligned with the IFC Performance Standards, but its requirements are less extensive

Overall, the SRP Standards System has been assessed to be credible. However, the assessment identified some gaps between the Sustainable Rice Platform Standard for Sustainable Rice Cultivation (heretofore referred to as the SRP Farm Standard) (SRP 2023h) and the IFC Performance Standards (IFC 2012). The review also found several areas for potential improvement in the SRP's assurance and governance systems.

The analysis found that the SRP Farm Standard is aligned with the IFC Performance Standards in key areas, and implementation of the standard puts farmers on a path towards meeting the Performance Standards.

Specifically, the analysis of the SRP Farm Standard shows good overlap (albeit, with some gaps) with Performance Standard 1: Assessment and Management of Environmental and Social Risks and Impacts; Performance Standard 2: Labor and Working Conditions; Performance Standard 3: Resource Efficiency and Pollution Prevention; and Performance Standard 6: Biodiversity Conservation and Sustainable Natural Resource Management. In general, the gaps that are found in some of the subtopics are mainly due to SRP requirements being less extensive or detailed than the IFC Performance Standards.

One point that warrants follow-up with the SRP is an inconsistency of its standard with the International Labour Organization's (ILO) definition of hazardous child labor. The SRP has not included long working hours in its list of types of hazardous child labor, which is defined as more than 43 hours per week by the ILO (ILO n.d.). This gap would allow farms to meet the SRP Farm Standard even if 15- to 17-year-olds worked up to 48 hours a week (the maximum the SRP Farm Standard allows for all workers).

Topics not covered by the SRP Farm Standard may not always be material

The SRP Farm Standard does not cover Performance Standard 4: Community Health, Safety, and Security; Performance Standard 5: Land Acquisition and Involuntary Resettlement; Performance Standard 7: Indigenous Peoples; or Performance Standard 8: Cultural Heritage. In general, these performance standards are triggered based on the specific local context of an investment and are often not applicable. Any potential IFC investment in a rice project where these performance standards are triggered will require the client to take additional measures to ensure that these risks and impacts are effectively managed.

The SRP is a farm standard, and doesn't include first processing

The SRP Farm Standard is designed to be applied at the level of a farmer or farmer group and does not include the first processor in its scope of requirements. Large rice farmers (typically in North America and Europe) may implement the requirements themselves, while implementation partners and sponsors (nongovernmental organizations, companies, or other support organizations) may support smallholder rice farmers to apply the requirements and verify them. Implementing the full extent of the SRP Farm Standard would be a heavy administrative burden for a smallholder farmer or even a farmer group without the support of an implementing partner. Millers and processors are verified against the SRP Sustainable Rice Platform Chain of Custody (CoC) Policy and Standard, which covers volume accounting, traceability, and supply chain claims, but does not include environmental, social, or governance requirements (SRP 2024b).

The SRP is designed to encourage continuous improvement

To encourage and reward stepwise and continual improvements, the SRP allows a claim of "working toward sustainable rice cultivation" before farmers are fully compliant with the standard. This claim can be used once farmers achieve a minimum score of 33 out of 100, and they meet the "essential compliance" level (threshold) for requirements for heavy metals, weed, insect, disease, mollusk, and rodent management; rice storage; personal protective equipment; pesticide and chemical storage; pesticide disposal; child labor; and hazardous work. The claim of "sustainably cultivated rice" can be made when a producer or producer group meets all "essential compliance" levels and scores at least 90/100 in a third-party verification audit.

Group verification allows smallholder access to verification

The SRP's Internal Management System (IMS) Standard for Producer Groups Operating under the SRP Standard for Sustainable Rice Cultivation (Group Implementation) is a way to provide access for smallholders to the platform, as it provides a structure for a group of farmers to jointly manage implementation. This lessens the administrative burden. Group verification field assessments are also more efficient and economical, as the conformity assessment body—which is responsible for planning and carrying out audits, making verification decisions, and providing reports—looks at the internal management system of the group and carries out audits on only a sample of the group members. The SRP Standards System also recognizes that implementing parties or sponsor organizations often provide support programs for farmers and the commissioning of field verification. These organizations are required to join the SRP as members and manage the verification process, meaning the farmers don't have to pay a membership fee to participate. Only individual farmers and farmer organizations that are managing the implementation process themselves are required to be SRP members.

Third-party verification includes in-house approval of conformity assessment bodies by the SRP

The SRP Standards System follows best practice for credible voluntary standards claims, by requiring farmers and farmer groups to be verified by an independent third party. This is consistent with how IFC defines a credible certification system. However, the SRP conformity assessment bodies (CABs) are approved by the SRP Secretariat with a desktop assessment, which is not fully independent. To add a level of robustness, the SRP requires that CABs have accreditation from another voluntary standards system. This approach offers a light-touch, low-cost approach to accrediting CABs and is likely sufficient to avoid major issues in the short term.

Traceability and supply chain control are available throughout the supply chain

The International Organization for Standardization (ISO) defines a chain of custody (CoC) as "a process by which inputs and outputs and associated information are transferred, monitored and controlled as they move through each step in the relevant supply chain" (ISO n.d.). The SRP requires third-party verification of chain of custody up to and including the final manufactured product when the product has an on-product label or off-product verification.

The SRP defines three types of CoC models, all of which are consistent with the CoC models of other voluntary standards in primary production: (1) identity preservation (IP), where the identity of the farm that produced the rice is preserved

through the supply chain; (2) segregation system (Seg), where SRP-verified rice is kept separate from conventional rice through the supply chain; and (3) mass balance (MB), where SRP-verified rice is mixed with conventional rice in the supply chain and accounted for so that an equivalent volume of SRP-verified rice is sold (volume reconciliation). Because it does not require setting up and managing a physically separate supply chain, mass balance can be more cost effective than the other models for scaling up sustainably grown products.

As an ISEAL community member, the SRP is working towards good practice on governance

The ISEAL Alliance (previously the International Social & Environmental Accreditation & Labelling Alliance) is an association of leading, voluntary international standard-setting and conformity-assessment organizations that focus on social and environmental issues. The SRP is an ISEAL Community Member, meaning that it is working towards full compliance of the ISEAL Good Practice Codes, which are recognized as industry best practices for voluntary standards systems. As part of this process, the SRP must draw up an action plan and report to ISEAL annually on its progress.

The SRP is a multistakeholder association with open membership

The Sustainable Rice Platform is a membership association and is open to all registered legal entities. While tiered membership fees are assessed based on a company's annual turnover, in practice, some smaller companies may still find the membership cost prohibitive.

The SRP General Assembly is held annually to perform statutory functions and provide policy guidance. Each member gets one vote, which may mean certain interest groups could dominate the decision making, if that interest group had more members (currently there are significantly more commercial members than there are civil society members).

The SRP Board, which includes 13 voting members and one observer, is elected by the General Assembly, oversees management of the global organization on behalf of all members, and is responsible for the final approval of the standard. This differs from most other membership organizations, where the General Assembly of members is typically the supreme decision-making body.

There are opportunities for broader stakeholder participation in standard-setting

The Technical Committee, which is appointed by and reports to the SRP Board via the Executive Director, provides technical guidance on management and revision of the SRP Standard and Performance Indicators, the Assurance Scheme, and other related normative documents, as well as on the training program and farmer support tools. The Technical Committee is composed of representatives of stakeholder groups, and the SRP Standard Setting and Revision Procedure (SRP 2024d) includes guidance on seeking consensus between stakeholders (membership categories) and voting by stakeholder category in the absence of consensus. However, the SRP does not have a separate membership category for farmers and producer institutions, which is an important perspective to consider in the development and revision of the SRP normative documents and training programs.

There is a clear intent demonstrated in the SRP Standard Setting and Revision Procedure (SRP 2024d) to include a wide range of stakeholders, though in practice there has been a limited number of stakeholder workshops. In addition, because documents for consultation are posted online and in English, they are not accessible for some stakeholders. National SRP chapters (currently established in Cambodia and Thailand, and initiated in Pakistan and Nigeria) should help address some of the shortcomings related to local stakeholder engagement in the standard-setting process.

The SRP provides several mechanisms for raising complaints and grievances, including the SRP Organizational Grievance Policy and Procedure (SRP 2024c), for issues within the SRP organization and for issues submitted by stakeholders related to the SRP Standard and Assurance processes, regarding verification and audit decisions; and the SRP Whistleblowing Policy (SRP 2023i).

The SRP only makes limited data on verification available to the public

The SRP Standards System documents are all publicly available in English (and the Farm Standard is also available in Thai), and the list of approved CABs is posted on the SRP website. The SRP also has a searchable membership database.

The SRP includes data on the number of hectares (ha) verified and of farmers verified in its annual report. However, there is no public list of verified farmers and farmer groups, or CoC holders.

In March 2024, the SRP introduced a new system for data collection by conformity assessment bodies, under which they will collect data on six of the performance indicators as part of their field audit. Furthermore, the SRP is now developing a Low-Carbon Assurance module to add to the SRP Assurance Scheme, which will measure reductions in greenhouse gas emissions in rice produced under the SRP Standard for Sustainable Rice Cultivation. Both initiatives have the potential to increase the amount of data available. This is important for understanding the impact of the system as well as for helping members communicate in the market.

Compared to peers, the SRP is an underfunded, voluntary standard with limited market penetration

A comparative analysis was made of the Sustainable Rice Platform and other voluntary standards systems, including the Round Table on Responsible Soy Association (RTRS) for soy, Roundtable on Sustainable Palm Oil (RSPO) for palm oil, Better Cotton Initiative (BCI) for cotton, Rainforest Alliance for cocoa and coffee, and Forest Stewardship Council (FSC) for forest products.

The SRP's legal structure (a membership association) is largely consistent with that of other standards systems. The SRP differs from the others in that it has a "public sector" membership category. This is unusual for a voluntary standard, which is typically developed to go beyond what is required by government policies. At the same time, the SRP does not have a separate farmer and producer group membership category, which is inconsistent with other voluntary standards systems used in primary production.

The SRP has the lowest number of members out of the peer systems analyzed (though it was established much more recently), while at the same time having some of the highest fees for commercial participants. It is the only standards system analyzed that does not charge civil society members membership fees. The SRP's operating budget of €405,715,

based on 2022 annual expenditures (equivalent to US$426,619, using the yearly average exchange rate for 2022), is by far the smallest budget among peer systems—more than €1 million (US$1.1 million) less than the next-closest one (Round Table on Responsible Soy Association at €1.5 million or US$1.67 million).

While the Sustainable Rice Platform was founded more than a decade ago, it wasn't until 2020 that it launched its Assurance Scheme (the mechanism by which production can be verified as sustainable rice cultivation). The SRP verified its first farmers under the scheme in 2021. Analysis of the SRP and its peers shows that the market share of certified commodities varies significantly between standards systems, and that a system's length of time operating in the market is not a good predictor of its market share. That said, the SRP still has the smallest market share compared to its peers, at 46,280 hectares verified (2023 data provided by the SRP), or 0.4% of globally traded rice.

Table 1: SRP Standard for Sustainable Rice vs. IFC Performance Standards

Legend: A gauge chart captures the extent to which the SRP Farm Standard overlaps with each IFC Performance Standard, with light yellow representing little to no overlap and dark blue representing extensive or complete overlap. The position of each arrow is determined by an aggregated score reflecting how much the SRP Farm Standard overlaps with specific subsections of each IFC Performance Standard.

Performance Standard 1	**Assessment and Management of E&S Risks and Impacts** While the Environmental and Social Assessment and Management System (ESMS) requirements are not covered explicitly, the implementation of the SRP Farm Standard and the SRP Standards System provides an overall policy and implementation framework for risks and impacts in the rice sector that have been defined globally through the SRP multistakeholder roundtable. The SRP Implementation Management System (IMS) for farmer groups goes some way towards covering management and responsibilities, though this does not apply to single farms. The SRP Standards System verification provides monitoring and review. However, it does not have provisions for identification and management of site-specific risks or impacts, for stakeholder consultation, or for external communications or grievance mechanisms.	
Performance Standard 2	**Labor and Working Conditions** The SRP Farm Standard is consistent with the IFC PS on forced labor, freedom of association, nondiscrimination, and equal opportunity. The requirements on child labor are similar, though the SRP does not require a risk assessment or monitoring for children under age 18. The SRP is inconsistent with the International Labour Organization (ILO) in terms of its definition of hazardous child labor, with 15- to 17-year-olds permitted to work up to 48 hours a week under the SRP Farm Standard (vs. the 43 hours allowed by the ILO). The SRP Farm Standard's requirements on occupational health and safety are limited to personal protective equipment, safety instructions, and first aid.	

	It does not provide for an analysis of risks or implementation of preventive measures, e.g., modification, substitution, or elimination of hazardous conditions or substances. Note that for smallholder farmers, this type of risk analysis may need to be done at the cooperative or group level, or potentially as part of the SRP National and Regional Interpretations (rather than by the individual smallholder).[a]	
Performance Standard 3	**Resource Efficiency and Pollution Prevention** The SRP Farm Standard includes measures for water efficiency and fertilizer efficiency, though no overall measures for resource efficiency. The SRP Farm Standard is consistent with the IFC PS on reducing greenhouse gas emissions. The SRP Farm Standard has no overarching requirements on managing wastes or implementing pollution prevention. It has specific requirements on managing agricultural runoff and avoiding use of hazardous chemicals to control weeds, insects, and disease. The SRP Farm Standard is consistent with the IFC PS on integrated pest management (IPM).	
Performance Standard 4	**Community Health, Safety, and Security** This is not covered by the SRP Farm Standard.	
Performance Standard 5	**Land Acquisition and Involuntary Resettlement** This is not covered by the SRP Farm Standard.	
Performance Standard 6	**Biodiversity Conservation and Sustainable Natural Resource Management** The SRP Farm Standard has a cutoff date of 2009 for conversion of protected areas, Key Biodiversity Areas, Ramsar Sites (wetlands), primary forest, secondary forest (native), and other natural ecosystems and land types, such as prairie. This is consistent with the IFC PS requirements on native and modified habitat. Requirements on invasive species are also consistent with the IFC PS. While the SRP Farm Standard has provisions for maintaining or enhancing biodiversity at the field level, this is not an "essential compliance" level (i.e., it is optional). Furthermore, the Farm Standard has no requirements for identifying risks and impacts, nor for having a mitigation strategy or a competent professional to assist in identifying risks and impacts. It also does not require a robust, appropriately designed, and long-term biodiversity monitoring and evaluation program. The SRP has started collecting data on six performance indicators from farms through the conformity assessment bodies, though this is not part of farm-level risk and impact management.	
Performance Standard 7	**Indigenous Peoples** This is not covered by the SRP Farm Standard.	
Performance Standard 8	**Cultural Heritage** This is not covered by the SRP Farm Standard.	

Note: Charts in Table 1 indicate summary assessment scores. The full, detailed analysis is provided in the body of the report.

a Because the SRP recognizes that sustainable rice cultivation according to the SRP Standard can be interpreted differently according to country or region, the SRP provides a process for developing, reviewing, and endorsing national/regional interpretations so that they meet the same minimum thresholds. For more information, see the SRP's Protocol for Development of SRP National/Regional Interpretation Guidelines. https://sustainablerice.org/wp-content/uploads/2022/12/703-Protocol-for-Development-of-NIG-for-the-SRP-Standard-May-2020_ND.pdf.

1. Introduction

1.1 Scope of this document

This document presents the results of a comparative analysis of the Sustainable Rice Platform Standard for Sustainable Rice Cultivation, Version 2.2 (August 2023 NO-202308-ST-EN) (SRP Farm Standard) (SRP 2023h) and IFC Performance Standards on Environmental and Social Sustainability (IFC Performance Standards, or IFC PS) (IFC 2012). In addition, it shows the results of an evaluation of the SRP Standards System, including a review of its assurance (Section 3) and governance (Section 4) processes. The methodology for the benchmark is set out in Section 2.2.

Note that as part of good practice for standards-setting, the SRP Standards System undergoes regular review, public consultation, and updates. Therefore, this benchmark will need to be periodically updated to ensure that it remains consistent with the latest SRP Standards System. The SRP Farm Standard is scheduled for review in 2024.

This analysis has been undertaken by a third-party consultant for consideration and use by IFC. IFC's investment clients work towards meeting the IFC Performance Standards, which requires clients engaged in primary production of living natural resources, including natural and plantation forestry, agriculture, animal husbandry, aquaculture, and fisheries, to manage living natural resources in a sustainable manner. The IFC Performance Standards state that "where such primary production practices are codified in globally, regionally, or nationally recognized standards, the client will implement sustainable management practices to one or more relevant and credible standards as demonstrated by independent verification or certification." Therefore, the results of a Standards System benchmark can be used by IFC both to determine whether a given standards system is credible as per PS 6, and to act as a framework to understand how the standard could help a client meet the IFC Performance Standards.

1.2 Scope and limitations of the SRP Standards System

The SRP is a multistakeholder roundtable that operates a standards system for verification of sustainable rice using a third-party verification model. Conformity assessment bodies (the entities responsible for planning and carrying out audits, making verification decisions, and providing reports, known as CABs) assess compliance with the standard. The system is based on a prescriptive standard, which means that criteria are defined as specific practices (rather than outcomes or performance thresholds). The SRP system includes a set of optional performance indicators.

1.2.1 Scope of issues covered

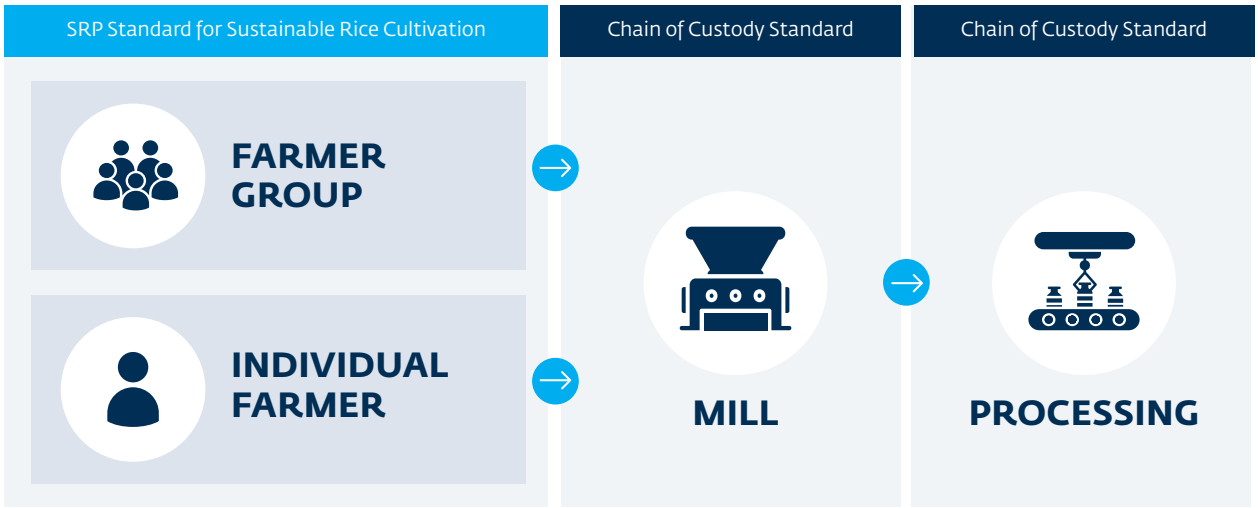
The SRP Farm Standard was developed in consultation with stakeholders to identify the most significant issues related to rice cultivation. It has 41 requirements, which pertain to food safety, good agricultural practices, and social and environmental criteria. High chemical residues are a significant food safety issue for rice and often result in the product being rejected by buyers. Social issues are covered through health, safety and labor-rights requirements, and environmental issues through water use, agrochemical management, and biodiversity requirements.

1.2.2 Unit of verification

The SRP Farm Standard is a production standard, which means that requirements are limited to farming activities. These include field practices, and where applicable, management and organization of farmer groups. The Farm Standard can be applied to individual farmers, smallholder farmer groups, as well as larger farms. In Asia and Africa, rice is predominately a smallholder crop. Large-scale rice production is more typical in the United States and Europe.

Millers, processors, and manufacturers in the rice-supply chain claiming SRP-verified rice must be verified against the Chain of Custody (CoC) Policy and Standard (SRP 2024b). This standard covers data management and accounting of SRP-verified rice, and does not include any social, environmental, or governance requirements for the mills, processors, or manufacturers. The SRP Farm Standard is not applicable to mills or further processing, as shown below in Figure 1.

Figure 1: The Application of Different SRP Standards in the Supply Chain



1.2.3 Minimum compliance

The SRP Farm Standard is based on a continuous improvement model, which ranks compliance with each requirement by assigning a value of between 0 and 6 points (where 0 is no compliance and 6 is full compliance). Additionally, "essential compliance" levels are defined for each requirement; these represent minimum thresholds that must be met in order to make any claims.

Farmers or farmer groups undergoing third-party verification are allowed to make claims for two different progress levels:

Working toward sustainable rice cultivation

- Score at least 33 points on the 1–100 scale; and
- Meet the essential compliance level (threshold) for requirements 4,18.1–18.5, 23, 29, 33, 34, 35, and 36 (if requirements are applicable).

Sustainably cultivated rice

- Score at least 90 points on the 1–100 scale; and
- Meet the essential compliance level (threshold) for all applicable requirements.

Figure 2: Illustrative Example of Compliance Levels

HEALTH AND SAFETY				
Requirement	Impact	Requirement	Level(s) of Compliance	Points
26	**Worker health and safety**	**SAFETY INSTRUCTION AND FIRST AID** Workers, including working household members, receive regular safety instructions on how to prevent work-related accidents or diseases, where to access first aid kits, and how to contact health workers. The first aid kit should be well-labeled and available on-farm or placed at a designated medical center known by and accessible to farmers in a group.	a. Workers, including working household members, receive safety instruction annually, and first aid kit is available on-farm or at a designated medical center known by and accessible to farmers in a group. b. Workers, including working household members, have received safety instruction, and are aware of how to contact the nearest health worker or clinic. c. There is no safety instruction.	2 1* 0

Note: All requirements have several possible levels of compliance. For each requirement, an essential compliance level (threshold) has been defined. This level is indicated for each requirement by an asterisk (*) next to the level of compliance. Together with an overall score of 90% or more, these thresholds must be met in order to claim "sustainably cultivated rice." In this example, the producer would at a minimum have to meet all conditions listed in Level of Compliance (b) to claim "sustainably cultivated rice," but it would not need to make a first aid kit available as required for achieving the highest level of compliance (and most number of points) for Requirement #26. However, compliance with Requirement #26 is not mandatory to claim "working toward sustainable rice cultivation."

1.2.4 Impact measurement

The SRP Farm Standard is based on verifying that producers have undertaken a series of practices (e.g., first aid training), which differs from a performance-based standard, which has thresholds for measured outcomes (e.g., x number of annual workplace accidents).

While the SRP Farm Standard requires farmers to record data on eight points related to profitability, productivity, water productivity and quality, and nutrient-use efficiency (as set out in SRP Farm Standard Requirement 2: Record Keeping), it does not mandate minimum performance thresholds that must be met for these data. Therefore, as part of the field verification, conformity assessment bodies check that data on these eight points have been collected at the basic data level (as defined in the Record Keeping requirement).

The SRP Standards System also includes a separate document, SRP Performance Indicators (SRP 2020b), which partially overlaps with the SRP Farm Standard's Record Keeping requirement (see Table 2). This analysis shows that farmers meeting the SRP Farm Standard only partially cover the basic data recording levels set out in the SRP Performance Indicators. Conformity assessment bodies are not required to check if farmers have recorded data for the performance indicators. Therefore, since they are an optional tool, the SRP Performance Indicators have not been included in the benchmark scoring (see Section 2.2).

The SRP has mapped each requirement in the SRP Farm Standard to one of the seven indicators of the SRP Performance Indicators, with the expectation that implementing the SRP Farm Standard will drive impact in these thematic areas.

The seven themes covered by the performance indicators are:

The introductory text to the SRP Performance Indicators explains that users can choose to record data at three levels: basic, medium, or advanced. These three levels allow users to select the optimal measurement level according to their resource availability, ease of data collection, or desired level of accuracy. The "basic" level of data records is designed to be possible for farmers to collect themselves, though it notes that "in addition to basic data recorded by the farmers (for example, in their Farmer Field Books), it will be an advantage for implementation partners such as farmer group leaders, service providers, or extension workers to collect data on certain indicators at intermediate or advanced levels." Ultimately, the implementing partner (such as a research institute, company, extension worker, project owner, group manager, or miller) is responsible for data collection, and individual performance indicators can be selected to show progress in achieving specific goals. However, checking whether the implementing partner has collected the required data is not part of the scope of the farm verification audits.

Interviews with SRP supply chain actors indicated that the performance indicators are not generally used to communicate information through the supply chain about specific volumes of SRP-verified material. However, data are being reported for some projects, for example, as part of the annual reports of project partners.

In March 2024, the SRP introduced a new system for data collection by conformity assessment bodies. Under this system, CABs will collect data on six of the performance indicators at the intermediate level as part of their field audit. If this rollout is successful, then the intention is to add it to the CAB requirements set out in the Assurance Scheme document. This would allow the SRP to track and aggregate data across all verified farms.

The SRP is currently implementing a pilot to measure reductions in greenhouse gas (GHG) emissions in rice produced under the SRP Standard. The SRP is working with several partners on this project, which is supported by grant funding from the ISEAL Alliance, including Regrow Ag; Mars, Incorporated; LT Foods; and Gold Standard. The aim is to integrate a GHG module into the SRP's existing system.

Table 2: Comparison of SRP Farm Standard and SRP Performance Indicators

SRP Farm Standard (Requirement No. 2: Record Keeping, Basic Level)	SRP Performance Indicators (relevant SRP indicator number is listed in each row below)
Field size	**1. Profitability: net income from rice** […] · Field size […] Data Level: Intermediate
Seed variety	Not covered
Input costs (land, labor, seed, agrochemicals, water, services)	**1. Profitability: net income from rice** · Amount of rice produced · Sale price of rice · Cash costs for inputs (land, seed, labor, agrochemicals) · Agricultural fees and taxes (irrigation fee) Data Level: Basic
Number of irrigations during and after land preparation	**4. Water productivity and quality** · No. of irrigations during land preparation and during the crop cycle · Data elements of Checklist A. PI No.4 (A checklist titled "Incoming water quality assessment," which is a yes/no checklist for farmers including: salinity, proximity to salt water, saltwater intrusion, water table impacted by tides, changes in water table depth, government warnings about salinization, and depletion of irrigation sources) Data Level: Basic
Fertilizer applied (number of times applied, amount applied, synthetic or organic)	**5. Nutrient use efficiency: Nitrogen (N)** · Number of times fertilizer was applied · Amount of fertilizer applied · Type of fertilizer applied (synthetic or organic) · Amount of rice produced Data Level: Basic
Pesticide applied (number of times applied)	**7. Biodiversity** · Data elements of Checklist B. PI No. 7 (A checklist titled "Biodiversity," which includes a basic data yes/no checklist for farmers, covering photos of pests, weeds, and beneficial organisms; and intermediate data pest-damage assessment framework) · Number of times pesticide was used · Area of land converted due to rice farming since 2009 Data Level: Basic
Amount of paddy harvested	**2. Productivity: grain yield** · Amount of grain produced (local unit)/field Data Level: Basic
Sales price of paddy	**1. Profitability: net income from rice** · Amount of rice produced · Sale price of rice · Cash costs for inputs (land, seed, labor, agrochemicals) · Agricultural fees and taxes (irrigation fee) Data Level: Basic

Sources: SRP 2023h; SRP 2023b.

2. Comparison of the SRP Standard with the IFC PS

2.1 Summary of findings of IFC PS comparison

The key finding from the analysis is that the SRP Farm Standard is aligned with the IFC Performance Standards on critical topics, and that the implementation of the former puts farmers on a path towards meeting the the IFC PS. However, the assessment of the SRP Farm Standard (2023) against the IFC Performance Standards (2012) also found some gaps between the two sets of requirements.

The analysis framework is based on the requirements of the IFC Performance Standards at the subheading level (see Section 2.2) for comparison with the SRP Standards System requirements. The results of the analysis are summarized in Section 2.3 through 2.10 below.

At the aggregated level (see Table 3), the analysis of the SRP Farm Standard shows good overlap with the IFC Performance Standards on PS 1: Assessment and Management of Environmental and Social Risks and Impacts, PS 2: Labor and Working Conditions, PS 3: Resource Efficiency and Pollution Prevention, and PS 6: Biodiversity Conservation and Sustainable Natural Resource Management. In general, the gaps arise because the SRP Farm Standard covers the same topic as the IFC PS, but the SRP requirements are not as extensive.

Table 3: Overlap of Requirements

IFC Performance Standards (PS)	Applicability	SRP Farm Standard
PS 1: Assessment and Management of E&S Risks and Impacts	All investments	Overlap with gaps
PS 2: Labor and Working Conditions	All investments	Overlap with gaps
PS 3: Resource Efficiency and Pollution Prevention	All investments	Overlap with gaps
PS 4: Community Health, Safety and Security	Context/risk-based	Not covered
PS 5: Land Acquisition and Involuntary Resettlement	Context/risk-based	Not covered
PS 6: Biodiversity Conservation and Sustainable Natural Resource Management	All investments	Overlap with gaps
PS 7: Indigenous Peoples	Context/risk-based	Not covered
PS 8: Cultural Heritage	Context/risk-based	Not covered

Sources: SRP 2023h; IFC 2012.

The IFC Performance Standards are underpinned by a requirement for clients to have an environmental and social assessment and management system (ESMS), as set out in PS 1. Therefore, it is important to note that the SRP Farm Standard does not specifically require such a system. However, implementation of the SRP Standards System will provide some key elements of an ESMS, including a policy, global identification of risks and impacts in the rice sector, and monitoring and review through the SRP verification process. Missing ESMS elements include emergency preparedness and response, stakeholder consultation, external-communications and grievance mechanisms, and ongoing reporting to affected communities (local communities directly affected by the SRP projects). Farmer groups implementing the internal management system (IMS) would also cover some of the requirements for organizational capacity and competency.[1]

A potentially important gap has been identified in terms of how the SRP Farm Standard addresses hazardous child labor. While the introductory text of the SRP child labor requirement indicates that children under the age of 18 cannot undertake hazardous work, how the SRP defines this and the list of what is actually verified ("levels of compliance") do not include long working hours. This is inconsistent with the International Labour Organization's definition, which recognizes 43 hours or more a week as hazardous.[2] Elsewhere in the document, the SRP Standard sets the maximum working hours permitted generally at 48 hours a week.

The SRP Farm Standard does not cover PS 4: Community Health, Safety, and Security; PS 5: Land Acquisition and Involuntary Resettlement; PS 7: Indigenous Peoples; or PS 8: Cultural Heritage. However, in general, these are performance standards that are triggered based on the specific local context of an investment and are often not applicable. Therefore, any potential IFC investment in a rice project where these performance standards are triggered will require additional actions by the client to ensure that these risks and impacts are effectively managed.

When considering the results of this analysis, it is important to bear in mind that the IFC Performance Standards were developed to cover a wide range of potential clients, notably large private-sector companies and financial institutions—not smallholder farmers. Smallholder farmers would typically be assessed as part of the downstream client's supply chain requirements (PS 2: Labor and Working Conditions and PS 6: Biodiversity Conservation and Sustainable Natural Resource Management); or as part of the operations of a client with primary processing and a close, long-term relationship with the farmers, such as through contract farming or—as exists in other crop supply chains such as oil palm—through "scheme smallholders" arrangements that are formally organized by the private sector company purchasing from them.

On the other hand, the SRP Farm Standard is designed to be applied at the level of a farmer or farmer group and does not include the first processor in its scope of requirements. Large rice farmers (typically in North America and Europe) may implement the requirements themselves, while implementation partners (nongovernmental organizations, companies, or other support organizations) may support smallholder rice farmers to apply the requirements and then verify them. Implementing the full extent of the SRP Farm Standard would pose a very heavy administrative burden on a smallholder farmer or even a farmer group alone. There is nonetheless an opportunity to explore how implementing partners could play a more defined management role, particularly in terms of identifying local risks and impacts, and supporting stakeholder engagement.

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[1] The internal management system (IMS) is a set of procedures and processes to be implemented by a producer group to ensure and demonstrate that it can achieve specified requirements. See SRP publication, "Overview of the SRP Internal Management System Standard" at https://sustainablerice.org/wp-content/uploads/2022/12/SRP-Internal-Management-System-Standard-Info-Page.pdf.

[2] ILOSTAT Child Labour Statistics (CHILD database) at https://ilostat.ilo.org/methods/concepts-and-definitions/description-child-labour-statistics.

2.2 Methodology

2.2.1 Benchmark process

The IFC Performance Standards cover eight areas of environmental and social responsibility and provide guidance on how to identify risks and impacts. They are designed to help avoid, mitigate, and manage risks and impacts as a way of doing business in a sustainable way, including through stakeholder engagement and disclosure obligations of the client in relation to project-level activities.

The aim of this benchmark was to evaluate whether successful implementation of the SRP Standard System's requirements would likely result in an outcome substantively equivalent to the IFC Performance Standards. A benchmarking framework was developed to assess this.

The methodology for benchmarking against the IFC Performance Standards was developed based on internal IFC documents commissioned in 2011, which set out a framework for assessing sustainability standards (Proforest 2011a and 2011b). This assessment maintains the same scoring methodology; however, a simpler analysis framework has been used for the purposes of the SRP Standards System assessment.

The analysis was undertaken using the SRP's documents. No analysis of in-field implementation was carried out. The benchmark was undertaken in February 2024. However, the SRP published revised versions of the SRP Standard Setting and Revision Procedure (March 2024 and July 2024), Chain of Custody (CoC) Policy and Standard (July 2024), and the SRP Organizational Grievance Policy and Dispute Resolution Procedure (May 2024), and the findings have been partially updated to reflect this.

After the initial draft benchmark, the SRP Secretariat was given the opportunity to review the preliminary findings, that is, to check whether any SRP documents had been missed, whether any new documents were available, and whether they found the assessment to be a correct interpretation of the SRP Standards System. No major issues were raised by the SRP. Feedback from the SRP was considered as part of the finalization of the benchmark, though the decisions on the final results were made independently by the technical expert contracted by IFC.

2.2.2 Assessment framework for the IFC Performance Standards

To create a framework to compare the IFC Performance Standards with the SRP Standards System, headings from each of the respective Performance Standards were used as assessment criteria. For example, in IFC PS 1: Assessment and Management of Environmental and Social Risks and Impacts, the heading "Stakeholder engagement" was used as a criterion, and each of the subsequent nine paragraphs (numbered 25 to 33) of supporting detail on this topic formed the basis of the comparative analysis, with an overall score reported for "Stakeholder engagement."

Each of the IFC PS's headings and its sub paragraphs were compared to the relevant requirements in the SRP Standards System, using a side-by-side comparison of the text. The overlap was assessed as "not covered" (0), "partially covered" (1), "fully covered" (2), "exceeds the requirements" (3), or "not applicable" (N/A), and a justification for the score provided (see Table 4). The results of this analysis (including the overlap score and justification) are presented in tables in Sections 2.3 – 2.10.

Table 4: Explanation of Scoring

Score	Explanation of score	Overlap
3	Exceeds the requirements. The SRP complies with or exceeds all requirements under the IFC PS heading.	
2	Fully covered. The SRP complies with all requirements under the IFC PS heading. The requirements of the IFC PS and SRP are substantially equivalent—either one-to-one equivalence of criteria or the requirements under the IFC PS heading are all covered, but in several different places in various SRP Standard System documents.	
1	Partially covered. Where the main heading of the IFC PS has more than one paragraph, the SRP partially complies or does not comply with one or more of the paragraphs. The requirements of the IFC PS are partly met but important gaps exist (either the standard lacks a significant element of the PS criterion, or the one-to-one or collective equivalence is weaker).	
0	Not covered. The topic is not covered in the SRP, or the requirements are contradictory to the IFC PS or insufficient.	

2.1.3 Assessment Framework for the SRP Standards System

An Assessment Framework for the SRP Standards System was developed to assess the assurance system (verification and auditing) and the governance of the SRP system. The System Assessment Framework is based on IFC Performance Standard 6: Biodiversity Conservation and Sustainable Management of Living Natural Resources, which provides a definition for a credible standards system in paragraph 27:

> Credible globally, regionally, or nationally recognized standards for sustainable management of living natural resources are those which (i) are objective and achievable; (ii) are founded on a multi-stakeholder consultative process; (iii) encourage stepwise and continual improvements; and (iv) provide for independent verification or certification through appropriate accredited bodies for such standards.
>
> *Footnote:* A credible certification system would be one which is independent, cost-effective, based on objective and measurable performance standards and developed through consultation with relevant stakeholders, such as local people and communities, Indigenous Peoples, and civil society organizations representing consumer, producer and conservation interests. Such a system has fair, transparent and independent decision-making procedures that avoid conflicts of interest.

Additionally, the ISEAL Good Practice Guide for Standard-Setting (ISEAL 2014) and Assurance (ISEAL 2018) were used as an additional reference for the assessment criteria. Note that these documents have been superseded by the ISEAL Code of Good Practice for Sustainability Systems, which was published in March 2024, after the analysis of the SRP Standards System was undertaken.

The same categorization (not covered, partially covered, fully covered, and exceeds requirements) has been used to illustrate the overlap between the SRP Standards System and good practices for assurance and governance of standards systems.

2.3

PS 1: Assessment and Management of Environmental and Social Risks and Impacts

IFC PS heading	Findings	Overlap score
Environmental and social assessment and management system	Partially addressed. The SRP Internal Management System (IMS) for farmer groups provides an overall management system, though this does not apply to single farms. See individual analyses of ESMS components below.	
Policy	The SRP Farm Standard is considered equivalent to "an overarching policy defining the environmental and social objectives and principles that guide the project to achieve sound environmental and social performance." (IFC PS text)	
Identification of risks and impacts	Partially addressed. While the SRP Farm Standard does not include requirements to identify risks and impacts at a specific project or at farm level, the multistakeholder consultation process of developing the standard has identified social and environmental risks and impacts for the global rice sector in general. However, this is not sufficient to be considered equivalent to the IFC PS for project-specific risks and impacts. The SRP Farm Standard refers to risk assessment for soil and water quality. However, this refers to the food safety risk, for example, if the soil and water in a farming location are likely already contaminated with dangerous levels of toxic metals. The standard does not have provisions for assessing the potential impact of rice cultivation in a specific local context. Similarly, the risk assessment described in the SRP Internal Management System Standard is not for assessing the potential impact of local rice cultivation.	
Management programs	Partially addressed. Through implementing the SRP standard, there will necessarily be a process of identifying gaps, developing training, and tracking progress as part of the verification process. Where applicable, this is also relevant for farmer groups' internal management systems, which have been assessed to be similar to an action plan.	
Organizational capacity and competency	Partially addressed. The SRP Internal Management System Standard for farmer groups addresses management and responsibilities, though this does not apply to single farms.	 Farmer Groups only
Emergency preparedness and response	Not covered.	
Monitoring and review	The overall SRP Standards System, in particular the Assurance Scheme and the Internal Management System (IMS) Standard for Producer Groups Operating under the SRP Standard for Sustainable Rice Cultivation (Group Implementation), are assessed to be equivalent to the IFC PS requirement for monitoring and review of the management program. For the purposes of this assessment, the management program referred to in the IFC PS is interpreted to be the farm's implementation of the SRP Standard for Sustainable Rice Cultivation, as there is no specific reference to a management program in the SRP Farm Standard.	

IFC PS heading	Findings	Overlap score
Stakeholder engagement	Not covered.	
External communications and grievance mechanisms	Not covered.	
Ongoing reporting to affected communities	Not covered.	

Sources: SRP 2023h; IFC 2012; SRP n.d.(b); SRP 2023f.

2.4

PS 2: Labor and Working Conditions

IFC PS heading	Findings	Overlap score
Human resources policies and procedures	Not covered. Likely not applicable to smallholder farmers. However, the SRP Farm Standard is also applicable to large farms.	
Working conditions and terms of employment	This is partially covered through SRP Farm Standard requirements for respecting negotiated agreements for wages. However, the provisions for working conditions and terms of employment only include wages and prescribe maximum regular working hours (48 hours per week) and minimum days off (one full day of rest for every six consecutive days worked). Furthermore, there are no requirements to identify migrant workers and protect their rights, nor to manage the quality of accommodation services provided by the employer.	
Workers' organizations	The SRP Farm Standard requirement is broadly equivalent to that of the IFC PS in terms of the right to join and establish workers' organizations without interference. However, it should be noted that the SRP Standard does not go as far as providing worker organizations with information needed for "meaningful negotiation in a timely manner."	
Nondiscrimination and equal opportunity	The SRP Farm Standard requirement is equivalent to that of the IFC PS. While the list of employment-related situations where discrimination must be avoided is not identical, the intent has been assessed as equivalent. The SRP Standard does not explicitly mention migrant workers, though these are implied in the list which includes no discrimination based on "ethnic background" and "national origin". Similarly, IFC PS draws specific attention to preventing and addressing harassment, intimidation, and/or exploitation, especially in regard to women, while the SRP Standard includes gender, as part of its general prohibition against sexually abusive, coercive, or threatening behavior. The intent is consistent and likely to result in the same outcomes in practice.	
Retrenchment	Not covered.	

IFC PS heading	Findings	Overlap score
Grievance mechanism	Partially addressed. While the SRP Standards System sets requirements for a grievance mechanism as part of the Group Verification Standard's IMS (to address producer group member complaints), there are no requirements for producers that are not part of groups (e.g., large farms) to implement grievance mechanisms, and in general, no requirements for either to implement grievance mechanisms for workers (which is part of the IFC PS 2 requirements). But the SRP grievance mechanisms are available for members of producer groups, who are farmers, but not for people employed by farmers. Furthermore, the SRP Standard System provides no details about the system that should be used to address grievances (timely feedback, without retribution, etc.). Similarly, the SRP Organizational Grievance Policy and Dispute Resolution Procedure is not for workers; it is only for complaints against the Standards revision process and the conformity assessment bodies (CABs), including audit results, or for complaints filed within the SRP organization.	
Child labor	Partially addressed. The IFC PS requires a risk assessment and regular monitoring of the health, working conditions, and hours of work for all persons under the age of 18—a requirement that is not covered under the SRP Farm Standard. The SRP Farm Standard uses 15 years as the cutoff for any nonfamily work, although it does allow family members under 15 living on family farms to work, provided it is nonhazardous work that does not interfere with education or leisure time and is for less than 14 hours a week and supervised by an adult. This is consistent with the ILO definition of light work for children in general, though the ILO sets a lower age limit of 12. The IFC PS does not specify a minimum age cutoff, but rather requires following applicable national laws, where national laws have provisions for the employment of minors. It is not clear whether the SRP requirements would be consistent with national law in all the countries where the SRP is or could be implemented. The ILO considers children who work longer hours to be working in hazardous child labor conditions, with longer hours defined as 43 or more hours per week. The SRP has an inconsistency with the ILO definition of hazardous child labor. While the SRP Farm Standard does not allow children below the age of 15 to be engaged as workers, in the section that defines hazardous child work, it does not list maximum hours per week. Elsewhere in the standard, workers are permitted to work up to 48 hours a week, which would effectively allow children aged 15 – 17 to work up to 48 hours a week. The SRP Farm Standard requires students of compulsory school age to attend school all year, which goes beyond the IFC PS.	
Forced labor	The SRP Farm Standard requirement is equivalent to the IFC PS. Both specifically refer to not participating in human trafficking. The SRP Farm Standard requirements go beyond those for the IFC PS, in terms of specifically detailing no withholding of payment, collecting of recruitment fees, or forcing of spouses and children to work. The SRP Farm Standard also requires that workers be allowed to leave the farm's premises at the end of their shifts and that regular working hours not exceed 48 hours per week, with at least one full day of rest for every six consecutive days worked.	
Occupational health and safety	Partially addressed. The SRP Farm Standard does not include a strategic approach to risk identification and prevention of physical, chemical, biological, and radiological hazards, or address specific threats to women, nor does it include a monitoring or emergency response, as required by the IFC PS. It also does not cover injury (only accidents and disease). The SRP Farm Standard's "essential compliance" level requires safety instruction but does not require a first aid kit to be available.	

IFC PS heading	Findings	Overlap score
Workers engaged by third parties	The SRP Farm Standard requirement is equivalent to that of the IFC PS. The intent of holding producers to the same standards in their treatment of contracted labor as of directly hired labor is clear in the SRP Farm Standard. However, the SRP Farm Standard does not cover the full extent of the IFC PS. Therefore, elements specifically referred to in this IFC PS requirement (e.g., ensuring the contracted workers also have access to a grievance mechanism) are not met, because the SRP does not require a grievance mechanism for directly hired labor. This shortcoming is not reflected in this score, as as this gap is already accounted for elsewhere in the assessment.	●
Supply chain	IFC PS requirements on labor and working conditions in the "primary supply chain" are not addressed in the SRP Farm Standard. However, this is likely not applicable as the SRP Farm Standard is applied at primary production, so there should not be third-party supplies of rice to the unit of verification.	N/A

Sources: SRP2023h; IFC 2012; SRP 2024d; ILO n.d.

2.5

PS 3: Resource Efficiency and Pollution Prevention

IFC PS heading	Findings	Overlap score
Environmental, health and safety guidelines	Not covered.	○
Resource efficiency	Partially addressed. The SRP Farm Standard includes requirements to enhance water-use and fertilizer efficiency, which is consistent with the IFC PS. However, no requirements address energy efficiency or proactively seek efficiency of other resources and material inputs.	◐
Greenhouse gases	The SRP Farm Standard requirements are equivalent to those of the IFC PS. The SRP Farm Standard includes options to reduce GHG emissions, including an essential-compliance level of no land conversion after 2009 and no burning of rice stubble or straw. Further, it includes a series of practices for GHG reduction through the efficient use of fertilizer (N/P/K), and water (e.g., levelling, alternate wetting and drying cycles, and dry direct seeding), of which at least one measure must be implemented to meet the essential-compliance level. The water management options vary depending on whether the land cultivated with rice is rainfed or irrigated, and whether it is prone to flooding. The continuous-improvement approach of the SRP Standards System has been assessed to be consistent with the IFC PS intent. Performance Standard 3 indicates: "The client will consider alternatives and implement technically and financially feasible and cost-effective options to reduce project-related GHG emissions during the design and operation of the project."	●
Water consumption	The SRP Farm Standard requirements are equivalent to those of the IFC PS. The SRP Farm Standard includes measures to reduce water consumption, as well as an essential-compliance requirement to seek and follow professional advice on sustainable groundwater use, and active participation in watershed management and community groundwater infrastructure projects.	●

IFC PS heading	Findings	Overlap score
Pollution prevention	Partially addressed. The SRP Farm Standard addresses managing agricultural runoff from drainage, but it is not as broad as the IFC PS, which covers release of pollutants to air, water, and land due to routine, nonroutine, and accidental circumstances.	
Wastes	Not equivalent. The SRP Farm Standard's requirements for wastes are limited to good practices for pesticide disposal, which is not enough to be considered either partially or fully consistent with the IFC PS. The IFC PS requires avoiding, reducing, recovering, and/or reusing all wastes (hazardous and nonhazardous), and assessing whether licensed disposal sites are being operated to acceptable standards, and if not, to consider alternatives.	
Hazardous materials management	The SRP Farm Standard is consistent with the IFC PS in terms of avoiding use of hazardous materials subject to international bans or phase-out: · Persistent Organic Pollutants in the Stockholm Convention · 1A or 1B under World Health Organization classification · Annex III of the Rotterdam Convention However, there is no provision in the SRP standard for avoiding hazardous materials other than those subject to international bans or phase-out, or for minimizing the use of hazardous materials, or for considering less hazardous substitutes.	
Pesticide use and management	Partially addressed. The SRP Farm Standard requires implementation of an integrated pest-management approach for weed, insect, disease, rodent, and mollusk management. However, it does not include disease vectors of public health significance or methods to prevent disease transmission to humans and animals. This may be applicable in rice, e.g., avian flu via integrated rice and duck farming, or schistosomiasis caused by parasitic worms. Additionally, while selecting chemicals that are effective against the target species is in the standard, it is not an essential-compliance requirement. Further, the standard lacks requirements to select chemicals that are low in human toxicity, or that have minimal effects on nontarget species and the environment.	

Sources: SRP 2023h; IFC 2012.

2.6

PS 4: Community Health, Safety, and Security

IFC PS heading	Findings	Overlap score
Community health and safety	Not covered.	
Security personnel	Not covered.	

2.7

PS 5: Land Acquisition and Involuntary Resettlement

IFC PS heading	Findings	Overlap score
General requirements and project design	Not covered.	
Displacement	Not covered.	
Private sector responsibilities	Not covered.	

2.8

PS 6: Biodiversity Conservation and Sustainable Natural Resource Management

IFC PS	Findings	Overlap score
Risks and impacts	Not covered.	
Adaptive management	Not equivalent. While the SRP Farm Standard includes practices to maintain and enhance site-specific biodiversity, this is not an essential requirement. Additionally, the standard has no requirements for farmers to be responsive to changing conditions or for the results of monitoring to be publicized throughout the SRP rice-cultivation-project lifecycle.	
Competent professionals	N/A for natural habitat, as the rice paddies and fields are areas modified by human activity. Not covered for critical habitat, as ride paddies and fields could still support wildlife, such as migratory species and congregatory species. The SRP Farm Standard doesn't include requirements for experts with appropriate regional experience to assist in the development of a mitigation hierarchy addressing impacts on biodiversity and ecosystem services.	
Biodiversity offsets	Not covered.	
Modified habitat	Partially addressed. The SRP Farm Standard doesn't specifically address modified habitat with significant biodiversity. However, it does prohibit conversion in Key Biodiversity Areas, and therefore modified habitat can be understood to be addressed by the standard. Note that the requirement to maintain or enhance site-specific biodiversity is not an essential-compliance level and the standard contains no provisions for implementing mitigation measures. Only conversion of these areas after 2009 is prohibited.	
Natural habitat	The SRP Farm Standard requirements are equivalent to those of the IFC PS. The SRP Farm Standard does not allow conversion of protected areas, Key Biodiversity Areas, Ramsar Sites (wetlands), primary forests, secondary forests (native), or other natural ecosystems and land types such as prairies.	
Critical habitat	Partially addressed. Critical habitat may include modified areas, such as rice paddies. The SRP Farm Standard refers to Key Biodiversity Areas, which are assessed to be equivalent to the Critical Habitats referred to in the IFC PS.	

IFC PS	Findings	Overlap score
Critical habitat (continued)	However, the SRP's "no conversion" requirement does not mandate the establishment of a robust, appropriately designed, and long-term biodiversity-monitoring-and-evaluation program, nor a biodiversity action plan designed to achieve net gains. An optional biodiversity checklist is available as part of the "basic" level of the performance indicator data collection, though currently there are no specific mechanisms for these data to be used for farm-management decisions.	
Legally protected and internationally recognized areas	The SRP Farm Standard requirements are equivalent to those for the IFC PS. The SRP Farm Standard does not permit the establishment of rice farming in legally protected areas, including protected areas, Key Biodiversity Areas, or Ramsar Sites (wetland), after a cutoff date of 2009.	●
Invasive alien species	The SRP Farm Standard is consistent with the IFC PS.	●
Management of ecosystem services	Not equivalent. While the SRP Farm Standard includes a requirement that "farming practices maintain and/or enhance ecosystem services," it does not require a process for identifying priority ecosystem services, nor for including affected communities in this process.[a] Further, the requirement to maintain or enhance ecosystem services is not an essential requirement.	○
Sustainable management of living natural resources	The SRP Farm Standard requirements are equivalent to those of the IFC PS. The SRP Farm Standard requires rice farming to be located on unforested land or on land that is already converted. Additionally, the SRP Farm Standard is a credible standard which uses independent verification, as per the IFC's definition.	●
Supply chain	This has been assessed as N/A because the SRP Farm Standard is applied at the level of primary production.	N/A

a Performance Standard Guidance Note 6 defines ecosystem services as the benefits that people, including businesses, derive from ecosystems. Ecosystem services are organized into four types: (i) provisioning services, which are the products people obtain from ecosystems; (ii) regulating services, which are the benefits people obtain from the regulation of ecosystem processes; (iii) cultural services, which are the nonmaterial benefits people obtain from ecosystems; and (iv) supporting services, which are the natural processes that maintain the other services. This definition originates from the from the Millennium Ecosystem Assessment, available at https://www.millenniumassessment.org/en/index.html.

2.9

PS 7: Indigenous Peoples

IFC PS	Details of compliance	Overlap score
Avoidance of adverse impacts	Not covered.	○
Participation and consent	Not covered.	○

IFC PS	Details of compliance	Overlap score
Impacts on lands and natural resources subject to traditional ownership or under customary use	Not covered.	
Critical cultural heritage	Not covered.	
Mitigation and development benefits	Not covered.	
Private sector responsibilities	Not covered.	

2.10

PS 8: Cultural Heritage

IFC PS	Details of compliance	SRP overlap
Protection of cultural heritage in project design and execution	Not covered.	
Project use of cultural heritage	Not covered.	

3. SRP Standards System: Assurance

3.1 Summary of findings on assurance

The SRP was founded more than a decade ago, though it only launched its Assurance Scheme in 2020 (SRP n.d.). Assurance is the mechanism by which production can be verified as sustainable rice cultivation (other standards systems refer to it as certification or auditing). It enables rice farmers and producer groups to show proof of compliance with SRP Standards.

For the purposes of this assessment, the framework for assessing the SRP's assurance against good assurance practices includes verification, accreditation, chain of custody, and claims. The framework for analyzing good practices for assurance is based on IFC's definition of credible certification schemes (see PS 6, point 27),[3] ISEAL's Assurance Code of Good Practice (ISEAL 2018), and the ISEAL Sustainability Claims Good Practice Guide (ISEAL 2015).

The SRP defines the majority of its assurance requirements in the SRP Assurance Scheme (2023e) document and provides additional details in the Sustainable Rice Platform Chain of Custody (CoC) Policy and Standard (2024b) and the SRP Brand Manual & Claim Guidelines (SRP 2023a).

IFC framework criteria	Findings	Overlap score
Verification	Third-party assessment is required for both farm and supply chain verification.	
Accreditation	Approval of conformity assessment bodies (CABs) is done internally by the SRP using a desk-based assessment and therefore lacks full independence. However, CABs are required to have accreditation from another voluntary standards system, which provides an additional level of robustness.	
Chain of custody	Three CoC models ensure the integrity of SRP rice claims through the supply chain (see Section 3.4 for definitions): · Identity preserved · Segregated · Mass balance Third-party CoC verification is required up to and including the final manufactured product.	
Claims	The compliance claims allowed by the SRP Standards System are consistent with the requirements set out in the SRP Farm Standard and encourage stepwise and continual improvements.	

Source: SRP 2023e, SRP 2024b, SRP 2023a, SRP 2023f, SRP 2023i.

[3] Credible globally, regionally, or nationally recognized standards for sustainable management of living natural resources are those which (i) are objective and achievable; (ii) are founded on a multistakeholder consultative process; (iii) encourage stepwise and continual improvements; and (iv) provide for independent verification or certification through appropriate accredited bodies for such standards (IFC PS 6, point 27).

The SRP's approach to assurance is well documented and clearly sets out the qualifications for conformity assessment bodies (CABs). The SRP Assurance Scheme document specifically covers:

Responsibilities within the SRP Assurance Scheme, including oversight of assurance, i.e., reviewing audit reports, conducting integrity audits, reviewing and calibrating CAB performance, overseeing remediation of CAB nonconformities, and applying sanctions as necessary, as well as ensuring competence and qualifications of personnel;

Requirements for producers, producer groups, and those engaged in assessing and reporting compliance or demonstrating improvements; and

Procedures to be followed in instances of concern regarding the assurance and oversight system.

The SRP Secretariat, which is led by the SRP Executive Director and responsible for the overall management and coordination of SRP's operations, programs, partnerships, communications, and resource mobilization, is also responsible for the management and implementation of the SRP Assurance Scheme. The SRP has been implementing an updated assurance system as of January 1, 2024. This system is documented in the SRP Assurance Scheme 2.0 dated November 2023. It supersedes and replaces Assurance Scheme 1.3.[4]

In the previous version of the assurance system, an assurance service provider (ASP) was responsible for the oversight of the verification bodies (VBs, which are now called CABs in the new 2.0 assurance system). Between 2020 and 2023, the ASP role was fulfilled by GLOBALG.A.P., a private company that sets voluntary standards and certification systems for agriculture, aquaculture, and floriculture production processes. As part of its role as assurance service provider, GLOBALG.A.P. supported the SRP by managing the approval process of SRP verification bodies and publishing these bodies' verification status on its online database. GLOBALG.A.P. was also an SRP-authorized training provider through its GLOBALG.A.P. Academy. As of January 1, 2024, GLOBALG.A.P. no longer provides these services to the SRP. The SRP no longer maintains a public database of verified farms or CoC operators, and the training courses are delivered by the remaining authorized training providers: the International Rice Research Institute (IRRI), Peterson Services Vietnam, and Preferred by Nature (formerly NEPCon). These providers deliver approved training courses and administer course exams, and the participants who pass receive certification from the SRP as SRP Authorized Trainers. To ensure high-quality implementation, consistency, and credibility of SRP-related claims, SRP members and Registered SRP Projects use only SRP Authorized Training Providers and/or SRP Authorized Trainers for SRP-related training activities.[5]

3.2 Verification

The SRP Assurance Scheme is based on third-party verification. To make public claims about compliance with the SRP Standard, and to use the SRP logo on products, farmers and farmer groups must be audited by a third party against the SRP Farm Standard. In addition, any organization that physically handles or trades rice must be verified against the

[4] The Sustainable Rice Platform's latest version of its Assurance Scheme is available at https://sustainablerice.org/wp-content/uploads/2023/11/SRP-Assurance-Scheme-2.0-Nov2023.pdf.

[5] For the list of trainers, see https://sustainablerice.org/list-of-srp-authorized-trainer/.

Sustainable Rice Platform Chain of Custody (CoC) Policy and Standard (SRP 2024b), up to and including the end-product manufacturer. Only third-party auditors (conformity assessment bodies, or CABs) approved by the SRP can carry out audits. While self-assessments are allowed and encouraged as part of continuous improvement, and as part of the Internal Management System (IMS) of producer groups, no public claims are allowed for self-assessed compliance with the SRP Farm Standard requirements.

Verification takes place in a three-year cycle, during which every farmer and all farmer groups are required to undergo two announced, full onsite audits, and one unannounced, full onsite audit. At least one onsite audit is conducted during harvest season, or prior to harvest when the paddies are ready for harvesting, so that the auditor can verify performance in the field. Verification must include all production sites for individual producers. Additionally, the SRP assurance system sets out requirements for auditing producer groups (typically composed of a group of smallholder farmers operating under a joint management system), including sampling a minimum of the square root of the number of registered group members or farms and plots for the initial audit, and for subsequent audits, never below 50% of the square root of the number of registered group members or farms and plots. The SRP Internal Management System (IMS) Guidelines for Producer Groups Operating under the SRP Standard for Sustainable Rice Cultivation (Group Verification) (SRP 2023f) offers access for smallholders to the platform, as it provides a structure for a group of farmers to jointly manage implementation, reducing the administrative burden. Group verification audits are also more efficient and economical, as the conformity assessment body looks at the Internal Management System (IMS) of the group and undertakes a sample. The SRP system also recognizes that support programs for farmers and commissioning of audits are often carried out by what it calls implementing parties or sponsors. These organizations are required to join the SRP as members and to manage the verification process. Only individual farmers and producer groups that are managing the implementation process themselves are required to be SRP members.

Previously, the Assurance Scheme permitted SRP-compliance claims based on the type of verification at farm: Level 1 (self-assessment, no claims allowed), Level 2 (second-party assessment, with advice from the verifiers permitted, claims allowed), and Level 3 (third-party assessment, claims allowed). All farm verifications are being shifted away from this "levels" approach starting in 2024, and only claims associated with third-party verification will be permitted in future.

A fee of € 2.00 (US$2.20) per hectare is charged for all verified producers and producer groups. This is paid to the conformity assessment body either by the sponsoring organization or implementing partner, or by the producers or producer groups if they directly contracted the auditors; this fee is in addition to audit fees and SRP membership fees. For the SRP CoC, there is an additional site-registration fee of € 250 (US$276) per site.

Currently, the SRP has approved three conformity assessment bodies: Control Union, Preferred by Nature, and OneCert.[6]

[6] For additional information on these conformity assessment bodies, see, respectively: https://www.controlunion.com; https://; www.preferredbynature.org; and https://onecert.com.

3.3 Accreditation

The SRP uses a light-touch, low-cost approach to accrediting conformity assessment bodies. The SRP Secretariat is responsible for reviewing, approving, and monitoring CABs. The requirements for CABs are set out in the SRP Assurance Scheme (SRP 2023e) and require the applicant organization to submit an internal assessment to show that it fully meets all competency, resource, and other requirements to operate an SRP verification program. Applicant organizations must submit an application form along with supporting evidence. A contract is then signed between the SRP and the CAB. The SRP has the right to undertake witnessed audits, where it would observe a field audit being led by a CAB and assess compliance of the CABs with the requirements of the Assurance Scheme. There is a plan and budget in place for undertaking a sample of witnessed audits in 2024.

However, best practice would be to use a third-party accreditation body that conforms with ISO 17011 to approve and authorize the conformity assessment bodies.[7] The SRP is an interested party and cannot be considered independent from the CABs over which it will have oversight; for example, revoking authorization for a CAB could impact existing certifications, limit the services available to would-be SRP participants, and have a negative impact on public perception of the SRP scheme.

The SRP does have a requirement that conformity assessment bodies are "accredited for at least one ISO 17065 agricultural or forestry standard" (which ensures the competence of an accreditation body in providing certification for the quality of products, processes, and services), so at least an independent check ensures that a robust system is in place across CAB activities. However, the scope of the ISO 17065 audit (undertaken as part of another certification scheme approval) would not include the SRP activities so issues could still be missed (ISO 2012).

In the short term, the SRP's use of conformity assessment bodies that are also independently accredited through more established certification and verification systems is probably sufficient to avoid major issues. With only three CABs, introduction of independent accreditation would be a costly endeavor for such a small pool. However, in the mid to long term, the SRP should consider how to bring more independence to the approval process and whether to use an external accreditation body.

3.4 Chain of custody

The International Organization for Standardization (ISO) defines a chain of custody (CoC) as "a process by which inputs and outputs and associated information are transferred, monitored and controlled as they move through each step in the relevant supply chain" (ISO n.d.).

The SRP's Chain of Custody requirements are defined in the Sustainable Rice Platform Chain of Custody (CoC) Policy and Standard (SRP 2024b). The SRP's three chain of custody (CoC) models are consistent with industry practices for voluntary standards systems for primary production (SRP 2024b). The SRP CoC system requires that all organizations in the supply chain are covered by the SRP CoC verification system, from farmer to the entity implementing final packaging of products carrying an SRP claim.

[7] ISO/IEC 17011:2017 specifies general requirements for accreditation bodies assessing and accrediting conformity assessment bodies (CABs). See https://www.iso.org/standard/67198.html.

Three CoC options are available:

Identity Preservation (IP)

– where the identity of the farm or farmer group where the rice originated is preserved through the supply chain

Segregation System (Seg)

– where the SRP-verified rice is kept separate from conventional rice through the supply chain

Mass Balance (MB)

– where the SRP-verified rice is mixed with conventional rice in the supply chain, and accounted for so that an equivalent volume of SRP-verified rice is sold as SRP rice (volume reconciliation)

The mass balance system used by the SRP allows the use of credits that are valid for three years (which does not require any physical link between the credit and the physically verified product). Volumes must be reconciled over a fixed 28-day period but can be carried forward if not sold during this period. Because it does not require setting up and managing a physically separate supply chain, mass balance can be more cost effective than the other models for scaling up sustainably grown products.

The cycle for the SRP CoC verification is three years. Onsite CoC audits are required for any organization physically handling the product, while a desktop CoC audit is required for an organization not physically handling the product.

3.5 Claims

The compliance claims allowed by the SRP are consistent with the requirements set out in the SRP Farm Standard and encourage stepwise and continual improvements. The rules for claims are defined in the SRP Brand Manual & Claim Guidelines (SRP 2023a) and the SRP Assurance Scheme (2023e).

The SRP recognizes that many farmers are already on the path towards sustainable rice cultivation and that improving sustainability performance is an incremental process. To encourage and reward stepwise and continual improvements, the SRP allows a claim of "working toward sustainable rice cultivation" before farmers are completely compliant with the full Farm Standard. This claim can be used once a score of 33 out of 100 has been achieved in a third-party verification audit, and the essential-compliance level (threshold) is met for Requirements 4 (heavy metals), 18.1–18.5 (weed, insect, disease, mollusk, and rodent management), 23 (rice storage), 29 (personal protective equipment), 33 (pesticide and chemical storage), 34 (pesticide disposal), 35 (child labor), and 36 (hazardous work).

The SRP sets specific requirements that must be met for rice to be labeled as sustainably cultivated or with the SRP logo. The claim of "sustainably cultivated rice" can be made when a producer or producer group meets all essential-compliance levels and scores at least 90/100 in a third-party verification audit. The on-pack logos are allowed for products that have full chain of custody from the producer to the end manufacturer and that use either the identity-preserved or segregated model. The SRP Standards System claims are based on the extent to which the producer or producer group has met the standard, as well as the chain of custody model used. No on-pack claims are allowed for products that use the Mass Balance model, though public claims may still be made (for example, in marketing materials, websites, or annual reports).

The SRP Standards System has clear guidelines for controlling claims and has the right to revoke the rights granted. Furthermore, the Whistleblowing Policy (SRP 2023i) provides a formal mechanism for reporting claim misuse: While claims are not specifically mentioned in the policy, the list of topics covered by the policy includes fraud as well as deceptive or fraudulent supply chain practices, which can be inferred to cover false or misleading claims.

4. SRP Standards System: Governance

4.1 Summary of findings on governance

The SRP is registered as a nonprofit association in Germany, with a Secretariat based in Bangkok, Thailand. Its decision-making organs include the SRP Board (elected by the General Assembly) and the General Assembly. The General Assembly, composed of all SRP members, meets annually to perform statutory functions and provide policy guidance. Membership is open to all legal entities (subject to membership fees) and is mandatory for supply chain members wishing to be third-party certified for the Farm Standard, and for conformity assessment bodies (CABs). Supply chain actors trading and selling SRP rice do not need to be members but do need to be chain-of-custody certified.

The framework for analyzing governance is based on IFC's definition of credible certification schemes (see PS 6, footnote 20)[8] and the ISEAL Standard-Setting Code of Good Practice (ISEAL 2014). A summary of results is presented below.

IFC framework criteria	Details of analysis	SRP overlap
ISEAL	The SRP is an ISEAL community member, which means it is working towards meeting the ISEAL Code of Good Practice but isn't yet fully compliant.	
Multistakeholder participation	The SRP is a membership association which is open to all legal entities. In practice, some smaller companies may find membership cost prohibitive. Each member gets one vote at the General Assembly, which may mean certain interest categories could dominate (there are significantly more members with commercial interests than civil society members, which could result in the former having de facto veto power). There is not a separate membership category for farmers and producers, which is an important affected party. The categorization of stakeholders is not always consistent.	
Standard-setting process	The SRP has a standard-setting procedure that is generally consistent with the ISEAL Code of Good Practice. The Technical Committee is responsible for endorsing a proposed standard and making a recommendation to the Board, and the Board makes the final decision on the standard. The General Assembly of members does not vote on the standards, which is unusual for a membership organization. There is a clear intent in the document to include a wide range of stakeholders. However, in practice, wider stakeholder consultation seems to have been limited to posting documents online in English, which likely will have excluded those directly involved in and affected by rice production.	

[8] A credible certification system is one that is independent, cost effective, based on objective and measurable performance standards, and developed through consultation with relevant stakeholders, such as local people and communities, indigenous peoples, and civil society organizations representing consumer, producer, and conservation interests. Such a system has fair, transparent, and independent decision-making procedures that avoid conflicts of interest (IFC PS 6, Footnote 20).

IFC framework criteria	Details of analysis	SRP overlap
Standard-setting process (continued)	Consultation in local and regional languages would constitute best practices. The SRP Standards System includes the possibility of setting up national chapters, which should address some of the shortcomings of local stakeholder engagement in the standard-setting process.	
Complaints and grievances	The complaints and grievances mechanisms cover the standard-setting process, CABs and audit results, and the internal SRP organization. Grievances may be submitted in any language. However, these documents aren't available in local languages of the countries where the SRP Farm Standard is implemented. The whistleblower policy provides a mechanism for stakeholders to report instances of potential misrepresentation or corruption.	●
Public information	The SRP Standards System documents are all publicly available. The list of approved CABs is publicly available. There is no public information on individual-verified farmers or farmer groups. Data on SRP verification (total hectares, number of farmers) are published retrospectively for the previous year in the annual report.	◐

Sources: SRP 2023h; ISEAL n.d.(b); SRP 2024d; SRP n.d.

The SRP's governance structure is well documented and set out in a series of documents, which were used as reference for the governance benchmark:[9]

- SRP Articles of Association
- SRP Bylaws and Rules of Procedure
- SRP Standard-Setting and Revision Procedure
- SRP Organizational Grievance Policy and Dispute Resolution Procedure
- SRP Conflict of Interest Policy
- SRP Anti-Corruption Policy
- SRP Whistleblowing Policy
- SRP Antitrust Compliance Policy
- SRP Safeguarding Policy
- SRP Procurement Policy
- SRP Due Diligence Policy
- SRP Confidentiality Policy
- SRP Privacy Policy
- SRP Policy on Intellectual Property Rights

4.2 ISEAL

The ISEAL Alliance is an association of leading, voluntary international standard-setting and conformity-assessment organizations that focus on social and environmental issues.[10] The SRP is an ISEAL community member, which means that it is working towards full compliance of the ISEAL good practice codes, the industry best practices for voluntary standards systems. As part of this process, the SRP has produced an action plan and reports annually on its progress to ISEAL.

The SRP has indicated that it is currently focusing on monitoring and evaluation (M&E) and anticipates becoming a full ISEAL member in 2025.

[9] The latest version of these documents can be found on the SRP website, https://sustainablerice.org/resources/.
[10] For more information on ISEAL, see https://www.isealalliance.org.

4.3 Multistakeholder participation

4.3.1 Membership

The SRP defines itself as an international multistakeholder alliance. It is a membership association, and in principle, is open to all interested parties.[11]

SRP membership is a prerequisite for field verification of the SRP Farm Standard by either the sponsoring organization or the implementation partner (which may be a private sector, not-for profit, or other organization, including producer groups or individual producers), depending on who commissioned the third-party assessment. While supply chain actors trading SRP rice do not need to be SRP members, they do need to have chain-of-custody verification. Organizations must be SRP members to use the SRP organizational logo trademark, but end users of the on-pack SRP-verified label or off-pack verification claims are not required to be SRP members.

There are four broad membership categories, with different annual membership fees:

Public sector	Supply chain actors	Service, input, and equipment providers	Civil society organizations
Government, United Nations and other intergovernmental agencies, public research institutions	Producer organizations, upstream supply chain actors, business associations, retailers	Verification bodies, input companies, information and telecommunication technologies (ICT) providers, knowledge partners, financial institutions, trading platforms, equipment suppliers	Advocacy and grassroots community-based organizations
Membership fees			
In-kind contributions	€1,500–€ 20,000 (US$1,650-US$22,200) per annum, depending on size	€ 750–€ 20,000 (US$832-US$22,200>) per annum, depending on size	In-kind contributions

According to the SRP website (https://sustainablerice.org/), the platform had 106 members as of May 2024. These include 25 public sector actors; 37 supply chain actors; 18 service, input, and equipment providers; and 26 civil society organizations. There is no separate membership category for rice farmers (producer organizations are included under the supply-chain-actors category) and there is just one farmer-association member, the "Rice Tiller" Cheshinovo association from North Macedonia, classified as a civil society member. There are no other smallholder farmer groups, cooperatives, or farmer associations represented in the SRP membership. Current civil society members Solidaridad and Rikolto both work closely with smallholder farmers, and Oxfam participates as an external dialogue partner that strongly advocates for smallholders, though is not an SRP member. However, this is not the same as direct farmer representation of interests. The lack of

[11] For additional information, see the SRP's Membership Program Manual at https://sustainablerice.org/wp-content/uploads/2022/12/SRP-Membership-Program-Manual.pdf.

farmer members is problematic, since rice farmers, and in particular, smallholders, are directly affected by the content of the SRP Farm Standard. Several SRP members do have areas under rice cultivation as part of integrated supply chains. For example, Olam operates rice paddies in Nigeria, and Riso Gallo and Riso Scotti grow rice in Italy, though these are all large-scale operations.

Some small inconsistencies appear in how the SRP categorizes members. For example, most CABs (auditors) are classified as service providers, whereas Quality Certification Services, a U.S.-based certification program, is classified as a civil society organization. Similarly, VGREEN, a private limited company offering consultancy services in greenhouse gas accounting, is categorized as a public sector organization. The classification helps to determine annual fees and the composition of the Technical Committee (see Section 4.4).

Current membership appears to be driven by companies participating in projects funded by development actors including Asian Development Bank (ADB), Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), the International Rice Research Institute (IRRI), IFC, Swiss Agency for Development and Cooperation (SDC), and the United States Agency for International Development (USAID), as well as supply chain actors linked to retailers and manufacturers buying SRP rice, in particular, Lidl Stiftung & Co. KG; Mars, Incorporated; Ebro Foods, S.A.; Olam Global Agri Pte Ltd; Ricegrowers Limited (SunRice); and Westmill Foods Co Ltd.

Some current members have indicated frustration with the high costs of participating in the SRP, including annual membership fees, costs of chain-of-custody verification, costs of SRP field verification, premiums, and SRP per-hectare fees. Therefore, some smaller supply chain actors may be de facto excluded despite the tiered membership fees.

It is also worth noting that some members have publicly referred to the SRP as the "United Nations Sustainable Rice Platform," which suggests a perception that the SRP is "owned" by the UN rather than being an independent membership association. This perception likely has arisen because of the seven years when the SRP Secretariat was hosted by the UN Environment Programme (UNEP). However, since 2019, this has no longer been the case.

4.3.2 Decision making

The General Assembly, which includes all current members, is the decision-making body of the SRP. Its functions include: electing the Board, reviewing and endorsing long-term strategic plans, providing feedback and strategic guidance on the development and implementation of the association's programs, operations, and outreach, as well as giving input on other decisions that the Board deems to require member endorsement.

Each member of the SRP has the right to one vote at the annual General Assembly meeting, and resolutions are passed by simple majority, as long as at least 25% of all members cast votes. However, it is important to note that given the current composition of the membership, it would be possible for economic interests to dominate over civil society, given that there are 55 members with commercial interests (supply chain actors; and service, input, and equipment providers) compared to only 26 civil society organizations. Further, some of the members classified as civil society are more closely linked to commercial interests, for example the International Fertilizer Association or the Pakistan Basmati Heritage Foundation (led by Galaxy Rice Mills).

The SRP Board must have a minimum of three and a maximum of 14 persons. Currently, there are 14 members, of which one, UNEP, is a nonvoting observer. Board members participate in an individual capacity and are not agents of members or of other organizations that (individually or collectively) nominated or elected them to the Board. This means that there is no requirement to have the membership categories represented at the Board level, and Board members should technically only represent their own views and not the interests of the organizations for which they work.

The SRP maintains a conflict-of-interest policy, which applies to all members of the SRP Board, the Executive Director, Secretariat staff and consultants, SRP committees with Board-delegated powers, representatives of SRP member institutions, and any other persons acting as agents on the SRP's behalf.

4.4 Standard-setting process

According to the SRP, its "tools are designed and regularly updated through a collaborative consultative process involving extensive engagement with key stakeholders" (SRP 2022a). The standard-setting process in general appears to be in line with the ISEAL Standard-Setting Code of Good Practice (ISEAL 2014), with a few exceptions related to stakeholder participation.

The SRP Standard-Setting and Revision Procedure (SRP 2024d) applies to the development of both SRP standards (the normative documents that are used in assessment) and the documents that define the SRP system. The standard-setting document was first published in 2022, to coincide with the first revision of the SRP Standard for Sustainable Rice Cultivation, and updated in March and June 2024, in anticipation of the next review of the SRP Standard for Sustainable Rice Cultivation.[12]

The initial SRP Farm Standard, which predated the standard-setting procedure, was developed over several years with input from members, stakeholders, and feedback pilot tests, including pilot projects that IFC was involved in implementing. Version 1 of the standard was phased out in 2019, and as of September 2024, the standard was at version 2.2 (SRP 2023h). The SRP's procedures stipulate that the standard must undergo review every three years, and the next review of the SRP Farm Standard was scheduled for 2024.

The SRP's Standard-Setting Procedure designates the SRP Secretariat as responsible for all standard development and revisions, and sets out the responsibilities of a working group, chaired by a member of the Technical Committee. The Technical Committee, which is appointed by and reports to the SRP Board via the Executive Director, provides technical guidance on management and revision of the SRP Standard and Performance Indicators, the Assurance Scheme, and other related normative documents, as well as on the training program and farmer support tools.

The Standard-Setting Procedure states that the Working Group "shall be composed of members of the SRP Secretariat and Technical Committee members, and others invited to ensure broad, balanced, and appropriate stakeholder engagement in revision processes including decision-making" (SRP 2024d). While the Board is responsible for appointing the Technical Committee, the SRP Secretariat is responsible for ensuring that working group members are selected according to experience, subject matter expertise, and stakeholder representation.

Broadly, the Technical Committee is responsible for endorsing a proposed new standard, and the SRP Board is responsible for approving it. Specifically:

- The Standard-Setting Procedure (SRP 2024d) indicates that the Technical Committee is responsible for submitting recommendations for the final draft text of a standard to the SRP Board for final approval, including all criteria applicable to a verified producer, site, or product.

[12] This benchmark was originally completed in February 2024, prior to the document updates. The previous findings were reviewed in this context and updated as necessary, however a full benchmark of the new document was not undertaken.

- The Terms of Reference for the Technical Committee (SRP 2022b) set out a minimum of seven and a maximum of 12 members of the Technical Committee, with the aim to achieve an equal balance allocated to each of the four membership constituencies (public sector; supply chain actors; service, input, and equipment providers; and civil society).
- If the Technical Committee fails to reach a consensus on its recommendation for the final draft text of a standard to be sent to the SRP Board for final approval, a majority vote shall be required within each stakeholder category within the Technical Committee.
- The SRP Board has the right to make the final decision on the standard content, including overruling recommendations made by the Technical Committee.[13]

As of June 2024, the Board had been requested to approve a change to the Bylaws (Section 4.3.3) that would remove the General Assembly's responsibility for approving or endorsing standards. The current wording reads: "The General Assembly is responsible for approving substantive changes to normative documents following Board endorsement. Normative documents include Standards, National Interpretation Guidelines, Performance Indicators, and Assurance Scheme." The proposed change would bring the process in line with the updated SRP Standard-Setting Procedure (2024d) and the SRP Articles of Association (SRP 2023d). However, in membership organizations, the General Assembly is normally the supreme decision-making body, and the SRP's approach would mean that members could not vote on a final standard.

Public consultation is an important part of the standard-setting process, and the Standard-Setting Procedure includes requirements that are in line with the ISEAL Code of Good Practice for Sustainability Systems such as a 60-day consultation period, as well as additional rounds of 30 days if necessary.[14] The ISEAL text states that "participation in the consultation process is open to all stakeholders; and aims to achieve a balance of interests in the subject matter and in the geographic scope to which the standard applies" (ISEAL 2014).

The SRP Standard-Setting Procedure has a clear intent to include a wide range of stakeholders. The SRP held a stakeholder workshop in Indonesia in 2017 as part of its development of the SRP Farm Standard. It also obtained input from the SRP Working Group on Farmer Support, Performance Measurement, and Assurance and from external experts. However, in practice, wider stakeholder consultation seems to have been limited to posting documents online in English, which likely excluded those most directly involved in and affected by rice production. The ISEAL code has similar language about identifying disadvantaged stakeholders and supporting their participation, and specifically refers to making regional visits and using local languages, as well as adopting consultation mechanisms and other tools that are accessible to and culturally appropriate for the stakeholder groups in question. For example, in-person meetings or workshops may be more appropriate than emails or online surveys when stakeholder groups are less likely to have Internet access.

The SRP system includes the possibility of setting up national chapters, which should address some of the shortcomings of local stakeholder engagement in the standard-setting process. Chapters have been established in Cambodia and Thailand and initiated in Nigeria and Pakistan. Part of the mandate of the national chapter is drafting national interpretation guidelines for the SRP Standard for Sustainable Rice Cultivation. Guidance also exists on translating the Farm Standard. Currently, there is a Thai translation and National Interpretation Guidelines for the United States.

[13] The SRP updated the Standard-Setting Procedure in March 2024 to remove conflicting information about who makes the final decision on standards and removed the SRP Secretariat's right to overrule the Technical Committee's decision. This right to overrule now sits with the Board.

[14] For more information on the ISEAL Code of Good Practice, see https://www.isealalliance.org/defining-credible-practice/iseal-code-good-practice.

4.5 Complaints and grievances

The SRP provides several mechanisms for raising complaints and grievances, depending on the type of issue. The SRP Organizational Grievance Policy and Dispute Resolution Procedure (SRP 2024c) incorporates two grievance and dispute resolution procedures:

1.

The mechanism for raising and resolving grievances and disputes within the SRP, e.g., involving a staff member, consultant, or service provider, or a member's designated representative, Board member, Technical Committee member, or Executive Director

2.

Comments, complaints, grievances, and appeals regarding substantive or procedural elements of SRP standards (including development and revision process), SRP Assurance Scheme (including development and revision process), and the performance of Conformity Assessment Bodies (CAB), including audit decisions

The Sustainable Rice Platform Whistleblowing Policy (SRP 2023i) is the mechanism for stakeholders to report wrongdoing, unethical behavior, dangers, or illicit activity in relation to the people or programs of the Sustainable Rice Platform (SRP 2023i). These include bribery, fraud, or graft; deceptive or fraudulent supply chain practices; deceptive or fraudulent assurance, verification, or training practices; breaches of antitrust law or policies; abuse, exploitation, or harassment; or any other breach of legal or professional obligations, including breaches pursuant to the SRP articles of association, bylaws, policies, and code of conduct.

While there are well-defined policies and mechanisms in place for submitting comments, grievances, and complaints, the explanatory documents are only available in English. Encouragingly, the Organizational Grievance Policy and Dispute Resolution Procedure (SRP 2024c) was updated in July 2024 to allow grievances to be submitted in any language (previously only English submissions were permitted). The SRP may also consider allowing whistleblowing submissions to be anonymous (there is currently a commitment to keep the identity confidential).

4.6 Public information

The SRP Standards System documents are all publicly available in English (and the Farm Standard is also available in Thai), and the list of approved CABs are posted on the SRP website. The SRP also has a searchable membership database online. Previously, the list of verified farmers and farmer groups and CoC-verified operators was posted online as part of the GLOBALG.A.P. database. This public database provided verification status and published summaries of all verifications. However, as of January 1, 2024, GLOBALG.A.P. no longer posts this data.

The SRP includes data on the number of hectares and farmers verified in its annual reports. However, because these reports are published the following year, there is not a current public summary of these data. The SRP has indicated that it is working on a system to make the data publicly available.

5. Comparison of SRP with Other Agribusiness Sustainability Standards Systems

5.1 Other voluntary standards systems

A comparative analysis was undertaken between the SRP Standards System and other voluntary standards systems, including the Round Table on Responsible Soy Association (RTRS) for soy, Roundtable on Sustainable Palm Oil (RSPO) for palm oil, Better Cotton Initiative (BCI) for cotton, Rainforest Alliance for cocoa and coffee, and Forest Stewardship Council (FSC) for forest products.

The themes of legal structures and founders, membership categories and fees, operating budget, and verification were selected in discussion with IFC, in order to help identify what factors could influence the participation in, and uptake and trajectory of the SRP.

5.2 Legal structure and founders

The SRP is a nonprofit membership association, registered in Germany. A number of other multistakeholder roundtables and standards systems are also registered in Germany or Switzerland because of the beneficial legal framework for membership associations in these two countries. The nonprofit membership association model facilitates stakeholder participation and decision making. See Table 5 below for further details.

Several multistakeholder roundtables and standards systems were founded in the mid-2000s, supported in part by the World Wildlife Fund's Market Transformation Initiative (MTI), and bringing together environmental and social NGOs and key industry players. Bonsucro, a global platform promoting sustainable sugarcane production, was also founded with these stakeholders, even though it is a limited company. Rainforest Alliance is the exception, as it was founded by environmental activists. The SRP differs from all of these in that it was founded by international development organizations, IRRI and UNEP, along with private sector players.

Table 5: Legal Structure and Founders

	Legal form	Country of Registration, Country of Secretariat location	Founders
SRP (rice)	Nonprofit association	Germany, Thailand	IRRI, UNEP, private sector
RTRS (soy)	Nonprofit association	Switzerland, Argentina	WWF Switzerland, Swiss retailers Coop and Migros, Amaggi, Solidaridad, Fetrauf-Sul, Unilever

	Legal form	Country of Registration, Country of Secretariat location	Founders
RSPO (palm)	Nonprofit association	Switzerland, Malaysia	WWF, MPOC, Swiss supermarket chain Migros, Unilever, international vegetable oil processor AAK
Bonsucro (sugar)	Limited company	England and Wales	30 stakeholders, incl. ED&F Man Commodities, Cargill
BCI (cotton)	Nonprofit association	Switzerland, UK	WWF, clothing retailers, NGOs, IFC, ICCO, IFAP
Rainforest Alliance (cocoa)	International NGO	United States	Daniel Katz, an American environmental activist
FSC (forestry)	Nonprofit association	Germany (initially Mexico)	Environmental NGOs, social stakeholders, businesses

Note: SRP = Sustainable Rice Platform; RTRS = Round Table on Responsible Soy Association; RSPO = Roundtable on Sustainable Palm Oil; BCI = Better Cotton Initiative; FSC = Forest Stewardship Council; IRRI = International Rice Research Institute, UNEP = United Nations Environment Programme; WWF=World Wildlife Fund; MPOC = Malaysian Palm Oil Council; ICCO = Interchurch Organisation for Development Cooperation; IFAP = International Federation of Agricultural Producers.

5.3 Membership categories and fees

According to the SRP website, the platform had 106 members at the time when this analysis was conducted (May 2024), which is the lowest number among the standards systems analyzed. The Round Table on Responsible Soy Association and Bonsucro are in a similar range, with 200 and 300 members, respectively. The Roundtable on Responsible Palm Oil (5,811), Better Cotton Initiative (2,607), and Forest Stewardship Council (1,212) all have significantly more members, though they have also been established for a much longer time.

The SRP splits its membership into four categories, which is consistent with how other roundtables operate (with the exception of Rainforest Alliance, which is a voluntary standard but not a multistakeholder roundtable). Among the other standards systems analyzed, the Round Table on Responsible Soy Association has the fewest categories (3), and the Roundtable on Responsible Palm Oil has the most (7). The Forest Stewardship Council takes a slightly different approach with three stakeholder "chambers," each divided into North and South subunits.

The SRP differs from its peers in that it includes a "public sector" membership category. This is unusual for a voluntary standard, which is typically developed to go beyond what is required by state policies and regulations (for example, because regulations have been deemed insufficient by local or international stakeholders). Voluntary standards systems draw their legitimacy from the stakeholders that support them (Lehtoren et al. 2021). These could include nongovernmental organizations (NGOs) and companies with commitments to achieve social and environmental targets that can be met through voluntary certification. Given that the SRP was founded by two international development organizations that work closely with governments and has largely been funded by the Deutsche Gesellschaft für Internationale Zusammenarbeit GmbH (GIZ) and given that rice is a staple food that is regulated by governments, there is some logic to including a public sector category. However, this has contributed to the impression that the SRP is much less market-driven than comparable voluntary standards systems.

The SRP does not include a separate producer or a farmer membership category (the Round Table on Responsible Soy Association, Roundtable on Responsible Palm Oil, Bonsucro, and Better Cotton Initiative all do), but rather places them in the supply chain category. This is inconsistent with the approach that other voluntary standards take, except for the Forest Stewardship Council, which groups all economic actors together in one chamber. However, in practice, the SRP has only one farmer association (which has been categorized as a civil society organization), in addition to vertically integrated company members.

Overall, membership fees for the SRP's economic actors (supply chain; and service, input, and equipment providers) are in the same range as those for Bonsucro and the Better Cotton Initiative. The Roundtable on Responsible Palm Oil is less expensive but has significantly more members. SRP supply chain membership starts at €1,500 (US$1,650), which is also significantly higher than any of the farmer/producer membership fees of other standards systems. The SRP is also the only standards system among the ones analyzed that does not charge civil society members membership fees. The details of the analysis are shown in Table 6 below.

Table 6: Membership

	Year founded	Number of members	Categories	Fees
SRP (rice)	2011	106	Public sector	In-kind
			Supply chain	€1,500–€20,000
			Retailers	€5,000
			Service, input, and equipment providers	€750–€20,000
			Civil society organizations	In-kind
RTRS (soy)	2004	200	Producers	€0–€2,500
			Industry, trade, and finance	€3,500
			Civil society organizations	€250–€1,250
			Observing members	€250
RSPO (palm)	2004	5,811	Oil palm producers	€500–€2,000
			Palm oil processors/traders	€2,000
			Consumer goods manufacturers	€2,000
			Retailers	€2,000
			Banks and investors	€2,000
			Environmental or nature conservation organizations	€250–€2,000
			Social or development organizations	€250–€2,000
Bonsucro (sugar)	2008	300	Farmers	US$0–US$1,000
			Farmer associations	US$200
			Industrial, mill associations	US$200–US$11,350

	Year founded	Number of members	Categories	Fees
			Intermediary (traders)	£650–£26,000
			End users	£650–£39,000
			Franchise credit buyers	£2,000
			Civil society	£200–£2,000
BCI (cotton)	2005	2,607	Civil society	€120–€2,300
			Producer organizations	€130–€1,270
			Suppliers and manufacturers	€2,100–€26,500
			Retailers and brands	€7,250–€57,500 + Volume Based Fee (VBF) + one time traceability activation fee
			Associate membership	€1,270–€12,650
Rainforest Alliance (cocoa)	1987	20 board members (not a membership organization)	N/A	N/A Supply chain actors pay a volume-based royalty fee
FSC (forestry)	1993	1,212	Three membership chambers represent environmental, economic, and social interests. Each chamber is divided into North and South subchambers.	Individual member: from US$38 (South) to US$100 (North)
			Organizational members (forestry companies, environmental groups, retailers)	Nonprofit organization: from US$75 (South) to US$5,000 (North)
			Individual members (academics, students, activists)	For-profit organization: from US$100 (South) to US$10,000 (North)

Sources: SRP 2024g; RTRS 2024; RSPO 2024; Better Cotton 2024; Bonsucro 2024; Rainforest Alliance 2024; FSC 2024.

Note: Fees in this table appear in their original currencies. as published by the respective sustainability standards systems. For comparison purposes, readers can use the following exchange rates, which reflect the average exchange rates for the month of September 2024: £1 = US$1.32 and €1 = US$1.11. SRP = Sustainable Rice Platform; RTRS = Round Table on Responsible Soy Association; RSPO = Roundtable on Sustainable Palm Oil; BCI = Better Cotton Initiative; and FSC = Forest Stewardship Council.

5.4 Operating budget

Significant variability exists in terms of the operating budgets of the standards systems analyzed. The Sustainable Rice Platform (based on its 2022 annual expenditures) has by far the smallest operating budget at €405,715 (US$450,344), followed by the Round Table on Responsible Soy Association (€1.5 million or US$1.67 million), Bonsucro (£1.8 million or US$2.4 million), the Roundtable on Sustainable Palm Oil (US$10 million), Forest Stewardship Council (US$45 million) and Better Cotton Initiative (€37.7 million, or US$41.9 million). The Rainforest Alliance operations are much broader than its standard system (which covers multiple commodities), but it is still a useful comparison for scale.

The share of income from membership and grants was also analyzed, as this provides insight into the business models of the standards systems. This information may help the SRP further develop its business model, based on the experience of its peers. Overall, where reported, grants and donations comprised a proportionally small part of the income sources. However, the extent to which membership fees contribute to annual operating budgets varied significantly: from less than 1% (Forest Stewardship Council) to almost 90% (Bonsucro) to 119% (SRP).

The details of the analysis are shown in Table 7.

Table 7: Operating Budget

	Year founded	Total operating budget or annual expenditure	Annual membership-fee revenues (% operating budget or annual expenditure)	Grants
SRP (rice)	2011	€0.41 million (2022)	€0.48 million (119%) (2022)	€32,590 (2023)
RTRS (soy)	2004	€1.51 million (2021)	€0.38 million (25%) (2021)	Not reported
RSPO (palm)	2004	RM 48.54 million (2022) (US$10.2 million)	RM 20.22 million (42%) (2022) (US$4.3 million)	Not specified
Bonsucro (sugar)	2008	£1.82 million (2022)	£1.61 million (88%) (2022)	£0.18 million (2022)
BCI (cotton)	2005	€37.71 million (2022)	€13.54 million membership (35%) €22.94 million volume-based fee (2022)	€2.59 million (2022)
Rainforest Alliance (cocoa, coffee, tea, etc.)	1987	US$93.15 million (entire organization, not just cocoa) (2022)	US$55.65 million (60%) certification royalty revenue from all commodities (2022)	US$30 million in government grants and contracts, foundation and corporate grants, major donors and individuals, covering all operations (2022)
FSC (forestry)	1993	US$45.17 million (2022)	US$0.27 million (0.6%) (2022)	US$0.12 million (2022) donations revenue

Sources: SRP n.d. (for Sustainable Rice Platform); SRP 2024a (SRP); ANCORA Treuhand AG 2022 (RTRS); EY 2022 (RSPO); Bonsucro n.d.(a) (Bonsucro); BCI n.d. (Better Cotton Initiative); Rainforest Alliance n.d. (Rainforest Alliance); FSC n.d.(a). (Forest Stewardship Council).

Note: Fees in this table appear in their original currencies. as published by the respective Sustainability Standards Systems. For comparison purposes, readers can use the following exchange rates, which reflect the average exchange rates for the month of September 2024: £1 = US$1.32, €1 = US$1.11, and RM1 = US$0.24. SRP = Sustainable Rice Platform; RTRS = Round Table on Responsible Soy Association; RSPO = Roundtable on Sustainable Palm Oil; BCI = Better Cotton Initiative; and FSC = Forest Stewardship Council.

5.5 Verification

The trajectory of multistakeholder roundtables and standards systems tends to follow a path of first founding the organization, holding stakeholder discussions and strategy development, developing a standard and assurance system, and then realizing the first verification or certification. Once the standards system document is complete, time is still required to reach the first certification (or verification) and to implement new practices, training, and auditing.

The analysis of the Sustainable Rice Platform's peers found that the time between launching the standard and first certification varied between one and three years. This is consistent with the SRP's trajectory, as the assurance scheme was launched in 2020 and the first SRP-verified rice was in 2021.

Where the SRP seems to have taken longer than its peers is in the length of time between founding the organization and launching the Assurance Scheme (nine years). The SRP wasn't initially planning to develop a standards system, which is part of the reason for the delay. The next-longest development period was by the Round Table on Responsible Soy Association (RTRS), which took six years between the founding and launching of the standards system.

The SRP has the smallest market share compared to its peers at 46,280 hectares verified, estimated to account for 0.4% of globally traded rice. The market share of certified commodities varies significantly between standards systems, and the length of time in the market is not a good predictor of market share. For example, the Better Cotton Initiative harvested its first Better Cotton only 12 years ago and has an estimated 22% of the global cotton market, compared to the Round Table on Responsible Soy Association, which started certifying at about the same time, and only has approximately 1% of the market. The Forest Stewardship Council has been certifying for more than twice as long as the RTRS (almost 30 years) and has an estimated 16% of the market share for global wood products.

The details of the analysis are shown in Table 8.

Table 8: Verification and Market

	Year founded	Certification launched	First certification	Ha certified / mt	% market
SRP (rice)	2011	The SRP Assurance Scheme was launched in 2020.	2021	46,280 ha (2023) 120,77 mt (2021) 8,178 verified producers (2023)	0.4% of globally traded rice[a]
RTRS (soy)	2004	The RTRS certification scheme has been operational since end-2010.	2011	2.0 million ha 7.1 million mt[b]	1% (2019 data)[c]
RSPO (palm)	2004	The RSPO Principles and Criteria (P&C) pilot was launched in 2005.	2008	4.9 million ha 15.4 million mt (certified sustainable palm oil, or CSPO)[d]	19% (CSPO)[e]

a Calculated using 2022 data: 200,000 mt SRP verified, and 54 million mt globally traded rice (traded rice accounts for <10% of total rice production, most of which is consumed domestically and not traded). Data from USDA Economic Research Service.
b RTRS 2023.
c Solidaridad 2020.
d RSPO n.d.(a).
e RSPO n.d.(b).

	Year founded	Certification launched	First certification	Ha certified / mt	% market
Bonsucro (sugar)	2008	In July 2010, a revised final version of the certification scheme was published, taking into account the requirements of the EU Directive 2009/28/EC.	2011	1.5 million ha 8.2 million mt (2021 data)	4.8% (2020 data)[f]
BCI (cotton)	2005	The first Better Cotton global standard was published in 2009.	2011 – The first harvests of Better Cotton took place in Brazil, India, Mali, and Pakistan.	5.4 million mt	22% (2022 data)[g]
Rainforest Alliance (cocoa)	1987	The SAN standard (used by the alliance until 2020) was initially developed in 1997. Not commodity specific.	Unclear when the first cocoa was certified. Scale-up after 2009 commitments by manufacturers.	3.9 million ha (cocoa) 2.1 million mt (cocoa)	46% (cocoa)[h]
FSC (forestry)	1993	In 1994, the first version of FSC's founding standard, namely the Principles and Criteria, was published.	1996 – The first certification body carried out the first certification of teak plantations in Indonesia.	215.7 million ha[i]	16% (2017 data)[j]

Note: SRP = Sustainable Rice Platform; RTRS = Round Table on Responsible Soy Association; RSPO = Roundtable on Sustainable Palm Oil; BCI = Better Cotton Initiative; FSC = Forest Stewardship Council; ha = hectare; mt = million tons.

f Bonsucro n.d.(b).
g Better Cotton n.d.
h Rain Forest Alliance 2023.
i FSC n.d. (b).
j GWMI 2017.

6. Conclusion

The Sustainable Rice Platform has been assessed to be a credible standards system, based on the analysis of system documentation and follow-up clarification with the SRP Secretariat.

In general, the Sustainable Rice Platform Standard for Sustainable Rice Cultivation (Farm Standard) has good overlap with the IFC Performance Standards on Environmental and Social Sustainability (IFC Performance Standards, or IFC PS) on key topics, though not all IFC standards are covered. Similarly, the SRP Standards System includes well-documented requirements on assurance and governance, though there are still some areas for improvement. The SRP's ISEAL membership should help it move forward on these, as it is required to have an action plan and report annually on progress towards meeting ISEAL good practices.

Implementation of the SRP Farm Standard by an IFC client can help the latter implement an action plan to show how it will meet and maintain compliance with IFC's Performance Standards over time. This is particularly relevant for downstream processing and manufacturing clients who need to manage risks in their rice supply chains. The identification of gaps in this analysis is not a critical issue, as depending on the specific investment context, additional due diligence can be implemented by IFC. The client can also take additional measures alongside implementation of the SRP Farm Standard.

Finally, it is important to note that the SRP Standards System has been developed with stakeholders for a specific commodity context, and it may not be necessary nor desirable to add new requirements to address the identified gaps with the IFC Performance Standards. IFC needs to consider the strategic context of smallholder rice farmers and the extent to which they would have the ability to implement the full extent of the IFC PS. With respect to the SRP Standards System's assurance and governance, the cost implications of introducing new system requirements should be balanced with the risk of material impact on credibility in the short term.

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